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CODE OF ETHICAL PURCHASING

This Code of Ethical Purchasing (hereinafter "Code") describes the ethical and legal duties, responsibilities and obligations of the machine, equipment, software, system, material and service suppliers (hereinafter "Supplier") of Elisa Corporation and/or the companies belonging to the same group (hereinafter collectively "Elisa"). This Code is based on international labour standards set out in the ILO conventions, the United Nations' Universal Declaration of Human Rights, the United Nations' Guiding Principles for Business and Human Rights and the Convention on the Rights of the Child.

Implementation and applicability of the Code

- Elisa expects all its Suppliers to implement this Code across their business operations and supply chains.
- In addition to compliance with this Code, Suppliers are expected to comply with all applicable laws, directives and standards in all countries in which they operate.
- Suppliers are expected to appropriately communicate this Code to their employees and to ensure that adequate trainings and procedures are in place to enable compliance with this Code.
- This Code is applied both for the purposes of promoting safe and fair working conditions and responsible management of environmental and social issues in the supply chain of Elisa.
- Suppliers are expected to follow the Elisa Code of Conduct or similar principles in their operations, to provide Elisa a reasonable access to all relevant information and premises for the purposes of assessing performance against this Code of Ethical Purchasing and the Elisa Code of Conduct or similar, and to use reasonable endeavours to ensure that their subcontractors do the same.
- Suppliers and their subcontractors are encouraged to report any suspected violations or non-compliance with this Code to Elisa's whistleblowing channel available at our webpage.

Code of Ethical Purchasing

1. Contract of employment

- All employees shall have an employment contract that defines the terms and conditions of employment.

2. Child labour

- No person is employed who is below the minimum legal age for employment.
- Children (persons under 18 years) are not employed for any hazardous work, or for work that is inconsistent with their personal development.
- Where a child is employed, the best interests of the child shall be the primary consideration.
- Policies and programs that assist any child found to be performing child labour are contributed to, supported, or developed.

3. Forced labour

- Forced, bonded or compulsory labour, slavery or human trafficking is strictly prohibited, and employees are free to leave their employment after reasonable notice. Employees are not required to lodge deposits of money or identity papers with their employer.

4. Occupational health and safety

- A healthy and safe working environment is provided for employees in accordance with international standards and national laws. This includes for example access to clean toilet facilities, drinkable water and, if applicable, sanitary facilities for food storage.



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- Where an employer provides accommodation, it shall be clean, safe, and meet the basic needs of employees.
- Appropriate health and safety information and training is provided to employees.

5. Freedom of association and right to collective bargaining

- As far as any relevant laws allow, all employees are free to join or not to join trade unions or similar external representative organization and to use their rights to collective bargaining.

6. Discrimination

- Negative discrimination, including but not limited to racial or gender discrimination, is prohibited.

7. Disciplinary practices

- Employees are treated with respect and dignity. Mental or physical coercion, any form of abuse or other harassment and any threats or other forms of intimidation are prohibited.

8. Working hours

- Working hours of employees comply with national laws and are not excessive.

9. Payment

- Employees understand the conditions of their employment and fair and reasonable pay and terms are provided. Consideration should be given to the type of work performed and the market wage for the work as well as any statutory minimum wage for the country concerned.

10. Anti-bribery, corruption and individual conduct

- No form of bribery, including inappropriate offers for payments to or from employees, customers, Suppliers, organizations or individuals, is tolerated.
- Supplier shall have reasonably adequate policies and procedures in place to monitor bribery and corruption risks.

11. Compliance with legislation regarding employees

- If the Supplier posts its employees from abroad or otherwise provides them to Elisa, the Supplier must ensure that the requirements set out in the legislation of the destination country are fulfilled.

12. Environment

- Processes are in place to actively improve the efficiency of limited resources (such as energy, water, raw materials) in use, to promote re-use and recycling of materials when possible and to ensure appropriate waste management.
- Appropriate management, operational and technical controls are in place to evaluate the risks of and minimize the release of hazardous and harmful emissions to the environment.
- Appropriate measures are in place to improve the environmental performance of products and services when in use by the end user.
- Innovative development of products and services that offer environmental and social benefits are supported.
- Appropriate measures are in place to manage Greenhouse Gas emissions (GHG) and energy consumption from Supplier's own operations. To proactively manage GHG emissions, Supplier is encouraged to:
 - Have emissions reduction targets
 - Measure and provide emission metrics for GHG emissions
 - Take actions to reduce the GHG emissions
 - Have a process to engage its subcontractors to drive GHG emission reduction within Supplier's operations and that of their subcontractors.

