

Hannes Snellman Supplier Code of Conduct

July 2025



Introduction

Hannes Snellman is a law firm that handles matters of critical importance. Our mission is to provide our clients with world-class advice and our people with world-class careers. Our work is regulated and overseen by the Finnish Bar Association.

At Hannes Snellman (“Hannes Snellman” or “we”) we believe in building strong, ethical partnerships with our suppliers. Our goal is to create a dialogue and partnership with our suppliers to ensure they abide by principles enshrined in the UN Global Compact and the UN Guiding Principles on Business and Human Rights. This code of conduct outlines the minimum standards our suppliers must meet when conducting business with us.

This Supplier Code of Conduct outlines minimum standards for our suppliers in addition to applicable laws and regulations, and it forms an integral part of all contracts between the Supplier and Hannes Snellman. If there are differences between the requirements of laws and regulations and this Code of Conduct, or between the Supplier’s own code of conduct and this Code of Conduct, the Supplier must adhere to whichever is stricter. The most recent version of this Supplier Code of Conduct is available at www.hannessnellman.com.

In this code of conduct, “Supplier” means an individual or legal person who provides Hannes Snellman with products or services. The definition also includes the Supplier’s own contractors and business partners who participate in the delivery of products and/or services to Hannes Snellman. The Supplier is responsible for communicating the requirements of this code of conduct to such contractors and business partners and for ensuring their commitment to these principles.

Laws and Regulations

Supplier must comply with all laws and regulations applicable to their operations.

Fair Competition

Supplier must compete fairly and comply with all applicable competition laws and regulations.

Confidentiality and Information Security

Supplier must protect confidential information and data and implement appropriate information and data security processes. Supplier undertakes to comply with applicable privacy and data protection legislation when processing personal data in relation to their business with Hannes Snellman.

Ethical Business Practices

Supplier must conduct their business ethically and with integrity. This includes avoiding conflicts of interest, maintaining accurate records, and ensuring transparency in their business dealings.

Prohibition of Corruption, Bribery, and Money Laundering

We have zero tolerance for extortion, bribery, and corruption. Supplier must commit to zero-tolerance for corruption and bribery, establish and maintain policies and procedures to prevent unethical conduct and proactively train their employees. They must also implement protective measures to prevent money laundering.

Human Rights and Labour Standards

Supplier shall treat people with dignity and respect universal human rights such as access to clean and healthy environment, freedom of thought, opinion, expression, religion and freedom from any discrimination based on e.g. race, age, nationality, gender, or sexual orientation, or freedom from any form of harassment. They shall uphold the freedom of association and the right to collective bargaining, eliminate forced and compulsory labour, child labour, and discrimination in employment.

Environmental Responsibility

Supplier shall comply with all applicable environmental laws and regulations. They shall strive to minimize their environmental impact and commit to continuously improving their environmental performance, including managing waste responsibly, reducing emissions, and using resources efficiently.

Ensuring Compliance

If a Supplier fails to meet the requirements outlined in this Code of Conduct, the Supplier shall inform Hannes Snellman immediately. Hannes Snellman may take the following measures:

- 1) *Notification and Rectification: request a corrective action plan to rectify the issue within a specified timeframe.*
- 2) *Audits and Inspections: conduct an audit and inspection of the Supplier to ensure compliance with this Code of Conduct.*
- 3) *Suspension of Business: suspend business with the Supplier until the issue is resolved.*
- 4) *Termination of Contract: In cases of severe or repeated non-compliance, terminate the contract with the Supplier.*

Whistleblowing Channel

Supplier shall ensure that its employees and other relevant stakeholders have access to grievance channels to anonymously voice their concerns about potential misconduct related to the requirements of this Code of Conduct.

Supplier Assessment Form

Hannes Snellman may require the Supplier to complete a Supplier Assessment Form. The form incorporates questions that cover the areas outlined in this Code of Conduct, including compliance with laws and regulations, ethical business practices, human rights and labour standards, environmental responsibility, and measures for non-compliance.

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