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# Verkkokauppa.com's Code of Conduct

At Verkkokauppa.com we want to operate openly and responsibly. The commitment to responsible business is an integral part of our culture, success, and values. This Code of Conduct applies to every one of us.

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## 1. ON OUR CUSTOMERS' SIDE AND AT THEIR SERVICE

We exist to serve our customers, and thus the customer is at the core of everything we do. We want to help our customers fulfil their passions and help them find the most suitable solution. We aim to achieve this by always serving our customers in a knowledgeable, honest, and bold manner. A good and necessary purchase is in the best interest of us all. We focus on successful customer experience, product availability, extensive delivery options, and reliable high-quality products.

We take care of the safety of our customers in stores and online, and our products are safe and compliant with standards. We treat and serve all our customers equally.

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## 2. OUR BRAND IS BOLD, AND WE COMMUNICATE ACTIVELY

We drive our brand forward with confidence. As a pioneer in retail, we show direction and participate actively in discussions related to products and trends. We have designated representatives to communicate financial information and to handle media relations. Each of us has a responsibility to nurture our brand because each of us represents Verkkokauppa.com in their work.

Our marketing may be bold and thought-provoking, but we ensure that we always communicate truthfully and in accordance with good practice.

As a publicly listed company, we communicate and report on our operations in accordance with the rules concerning listed companies' disclosure obligation and our own disclosure policy. Our key communication principles are timeliness, consistency, equality, and transparency. We ensure that our employees are familiar with rules concerning insider information and that they adhere to the company's insider guidelines.

[Disclosure policy](#)

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### 3. WE BUILD OUR STORY TOGETHER

Our personnel is a crucial success factor to us. We value each other and respect diversity and varying backgrounds. We play fair and work to promote equality. We aim to foster friendly, constructive and respectful communication, as established in our ethical guidelines for workplace communication. We wish to create a community where everyone has the opportunity to impact the operations and bring forth constructive ideas, and where we take heed of the feedback received from others.

[Personnel Policy](#)

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### 4. WE WORK WITH REPUTABLE PARTNERS

We know our business partners and select them with care. We expect our partners to adhere to this Code of Conduct.

In addition, we require our suppliers to commit to a more detailed Supplier Compliance Policy as part of our supply agreements.

We pay particular attention to responsibility and compliance issues in relation to our own brand products and direct imports. These issues include, for example, human rights, labor rights, environmental issues, administration, and procurement practices. Our own brand suppliers operating in risk countries are required to provide proof of, or consent to, an external corporate social responsibility audit.

We adhere to all applicable trade sanctions and customs provisions on import and export.

[Supplier Compliance Policy](#)

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### 5. WE ARE INCORRUPTIBLE AND DO WHAT'S RIGHT

We do not accept any type of corruption. We follow our anti-bribery and anti-corruption principles to recognize and prevent situations, where there is a risk of unethical influencing.

#### **Gifts and hospitality**

We follow the company's Anti-bribery and anti-corruption policy, including the limits and approval procedures contained therein. Accepting hospitality or a gift of negligible value or participating on a trip may be allowed in moderation, provided that it is part of building good partnerships, is inherently related to business, and non-recurring in nature. We avoid excessive hospitality, gifts and trips that might influence business decisions or even might appear as such.

#### **Conflicts of interest**

We always act for the benefit of the company. We avoid situations where personal interests or interests of related parties conflict with our work and might either impact decision making or appear as such to an outsider. We neither offer nor accept bribes or facilitation payments.

## Donations

We can support non-profit charities and social undertakings, also as part of our commercial activities. Decisions on such donations are made by the CEO. We do not fund or give donations to political parties or activities affiliated with them.

## Sponsorship

Sponsorships can be used to promote the company's strategic objectives, strengthen the desired image, and reach out to key target groups, provided that the collaboration is in line with this Code of Conduct.

## Cooperation with authorities

We aim to maintain a good relationship with the authorities and to cooperate with them openly and actively. As a general rule, hospitality and gifts are not part of interacting with the authorities.

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## 6. WE RESPECT HUMAN RIGHTS AND LABOR RIGHTS

We respect and promote internationally recognized human rights regarding our customers, purchase chains, as well as the workplace. We avoid causing or contributing to adverse human rights impacts and address any such impacts on our part.

We do not tolerate discrimination or harassment of any kind. We do not tolerate the use of child labor or forced labor, and recognize that young workers and special groups are entitled to special protection. We cherish the right to fair labor conditions, a healthy and safe work environment, reasonable working hours, and adequate compensation for work. We respect the employees' right to organize and to negotiate collectively.

Verkkokauppa.com's operations are also guided by international declarations, conventions and recommendations, such as the UN Universal Declaration of Human Rights and the UN Convention of the Rights of the Child, the ILO convention on the Fundamental Rights and Principles at Work, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

We also collaborate with suppliers in countries where human rights and occupational rights are not adequately protected by law. As a consequence, the requirement to respect human rights and occupational rights has been specified in detail in our Supplier Compliance Policy.

[Personnel Policy](#)

[Supplier Compliance Policy](#)

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## 7. WE SECURE OUR INFORMATION

Information security and data protection have an important role in ensuring the quality of our operations, and they are the responsibility of each of our employees. We follow our information security policies, principles and guidelines, and train our personnel on a regular basis.

We take care of confidential information and safeguard its protection, integrity and availability. Customer data and other personal data are subject to stringent confidentiality obligations, and this information is to be processed only when required by the job duties. Our privacy policy is transparent about the processing of personal data and the customers' possibilities to affect the use of their data.

Developing information security practices is continuous work that we regularly consider as part of risk management, operational process development, and planning.

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## 8. WE CARE ABOUT THE ENVIRONMENT

We monitor our environmental impact and continuously strive to improve our environmental work by minimizing the negative environmental impacts of our activities and by developing positive impacts. We look for ways to reduce energy consumption and emissions. We minimize waste and promote the reuse of materials. We aim to choose the packaging materials that are best for the environment and aim to use them efficiently.

The manufacture, transportation and use of the products we sell are part of our indirect environmental impact. We exercise due diligence in choosing business partners and require responsible environmental practices from our suppliers in accordance with the Supplier Compliance Policy.

An important part of our environmental responsibility is to provide a long-lasting product suitable for the customer's needs and, where possible, to provide support services to extend the product's lifecycle. When the product reaches the end of its lifecycle, we help the customer recycle it appropriately.

[Supplier Compliance Policy](#)

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## 9. WE COMPLY WITH LAWS AND REGULATIONS

We are familiar with the laws and regulations governing our activities and ensure compliance with them through internal policies and practices. We ensure that every employee is familiar with the guidelines and regulations affecting their own work. As a publicly listed company, we adhere to good corporate governance and the Corporate Governance Code issued by the Finnish Securities Market Association.

Central laws governing our day-to-day operations include, but are not limited to, laws concerning employee protection, privacy, anti-bribery and anti-corruption, prevention of money laundering, competition, consumer protection, environmental protection, and product safety.

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## 10. CONCERNS CAN BE BROUGHT FORWARD

Transparency is one of our values. We encourage our personnel to share their concerns and to ask for advice in uncertain situations.

The primary contact for our employees is their own supervisor. Suspected misconduct or concerns can also be reported to human resources management or company management. We ask our partners to reach out primarily to their appointed contact person. If necessary, anyone can submit a report, also anonymously, via our reporting channel at [compliance@verkkokauppa.com](mailto:compliance@verkkokauppa.com). Concerns related to information security should be reported to [security@verkkokauppa.com](mailto:security@verkkokauppa.com), and concerns related to physical security on premises to [turvallisuus@verkkokauppa.com](mailto:turvallisuus@verkkokauppa.com).

[Reporting channel for suspected violations](#) (whistleblowing)