

# Scanfil - Supplier Code of Conduct

---

## Contents

Introduction – our commitment .....	3
A. LABOR .....	4
1. Prohibition of Forced Labor .....	4
2. Young Workers.....	4
3. Working Hours .....	4
4. Wages and Benefits .....	4
5. Non-Discrimination, Non-Harassment & Humane Treatment.....	4
6. Freedom of Association & Collective Bargaining.....	4
B. HEALTH AND SAFETY .....	5
1. Occupational Health & Safety .....	5
2. Emergency Preparedness .....	5
3. Occupational Injury & Illness .....	5
4. Industrial Hygiene.....	5
5. Physically Demanding Work.....	5
6. Machine Safeguarding .....	5
7. Sanitation, Food & Housing.....	5
8. Health & Safety Communication .....	5
C. ENVIRONMENT .....	6
1. Environmental Permits and Reporting.....	6
2. Pollution Prevention and Resource Conservation .....	6
3. Hazardous Substances .....	6
4. Solid Waste .....	6
5. Air Emissions .....	6
6. Materials Restrictions .....	6
7. Water Management.....	6
8. Energy Consumption and Greenhouse Gas Emissions .....	6
D. ETHICS .....	7
1. Business Integrity .....	7
2. No Improper Advantage .....	7
3. Disclosure of Information.....	7
4. Intellectual Property.....	7
5. Fair Business Practices .....	7
6. Protection of Identity & Non-Retaliation.....	7
7. Responsible Sourcing of Minerals.....	7
8. Privacy .....	7

# Scanfil - Supplier Code of Conduct

---

E. CYBERSECURITY & DATA PROTECTION.....	8
1. Information Security & Risk Management .....	8
2. Incident Detection & Reporting.....	8
3. Protection of Confidential Information .....	8
4. Data Storage, Retention & Disposal.....	8
5. Subcontractors & Third Parties .....	8
6. Compliance & Audit Rights.....	8
F. MANAGEMENT SYSTEMS .....	9
1. Company Commitment.....	9
2. Accountability .....	9
3. Legal & Customer Requirements .....	9
4. Risk Management .....	9
5. Improvement Goals .....	9
6. Training .....	9
7. Communication .....	9
8. Engagement & Remedy .....	9
9. Audits .....	9
10. Corrective Actions .....	9
11. Documentation .....	10
12. Supplier Responsibility .....	10
REFERENCES .....	11
Standards and Conventions: .....	11
Other Useful References: .....	11

# Scanfil - Supplier Code of Conduct

---

## Introduction – our commitment

Dear Scanfil Supplier

At Scanfil, we are committed to building sustainable, responsible, and future-ready supply chains together with our key business partners. This Supplier Code of Conduct reflects our dedication to conducting business ethically, promoting human rights, protecting the environment, and ensuring long-term resilience across our global operations. Our approach is rooted in Scanfil's core values: we are Customer Focused, we Achieve Together with our business partners, we are Empowered in our decision-making, and we are Engaged to Perform with integrity and accountability.


As part of our sustainability journey, Scanfil is committed to the UN Global Compact, adheres to science-based climate targets through the Science Based Targets initiative (SBTi), and actively promotes Gender Equality across our organization and supply chain. We expect our suppliers to share these commitments and invite you to partner with us in building responsible and transparent value chains.

This Code of Conduct is based on the Responsible Business Alliance (RBA) principles and aligns with internationally recognized frameworks, including the ILO Core Labor Standards and the OECD Guidelines for Multinational Enterprises. By adhering to these guidelines, our suppliers contribute to ensuring that the products and services we deliver together meet high expectations of ethical conduct and sustainable performance, respecting people and the planet.

Our suppliers are required to comply with international standards such as ILO conventions and UN Global Compact principles. The Scanfil Code of Conduct is derived from these frameworks, and we expect our suppliers to apply and embed the principles within their own operations and extended supply chains.

At Scanfil, we work collaboratively with our committed suppliers to build sustainable, responsible and future ready supply chains through continuous improvement. Our preference is always to improve together, but in case our supplier is unable or unwilling to take corrective actions, we may be required to reassess and even discontinue the business relationship. Upholding the principles outlined in this Supplier Code of Conduct is essential for our long-term resilience and credibility of our global supply chain.

Sincerely yours,



Anna-Maria Tuominen-Reini  
Chief Supply Chain Officer

# Scanfil - Supplier Code of Conduct

---

## A. LABOR

*Scanfil's suppliers shall respect human rights and ensure fair and dignified treatment for all workers, including temporary, migrant, student, contract, and direct employees.*

### 1. Prohibition of Forced Labor

All forms of forced, bonded, indentured, or trafficked labor are prohibited. Workers must have freedom of movement and access to their personal documents. Employment agreements must be provided in a language the worker understands and issued to migrant workers before departure from their home country. All work must be voluntary, and workers may leave with reasonable notice. Recruitment fees must not be charged to workers; if paid, they must be reimbursed.

### 2. Young Workers

Child labor is prohibited. Young workers (under 18) may not perform hazardous work, night shifts, or overtime. Age verification systems must be in place. Student workers must be properly managed, protected, and paid at least the entry-level wage. Legitimate educational programs are allowed. If child labor is found, suppliers must provide remediation.

### 3. Working Hours

Working hours must comply with local laws and not exceed 60 hours per week including overtime, except in emergencies. Overtime must be voluntary, and workers must receive at least one day off every seven days.

### 4. Wages and Benefits

Wages must meet legal requirements, including minimum wages, overtime pay, and benefits. Equal pay shall be given for equal work. Wage deductions as discipline are prohibited. Workers must receive clear wage statements. Use of temporary or outsourced labor must follow local law.

### 5. Non-Discrimination, Non-Harassment & Humane Treatment

Suppliers shall ensure a workplace free from discrimination, harassment, violence, and abusive treatment. No discriminatory practices are allowed in hiring, pay, or promotion. Workers must receive reasonable accommodation for disability and religion. Medical tests that could be used for discrimination—such as pregnancy or virginity tests—are prohibited.

### 6. Freedom of Association & Collective Bargaining

Suppliers shall respect workers' rights to form or join unions, bargain collectively, and participate in peaceful assembly without fear of retaliation. Where legal restrictions apply, workers must be allowed to establish alternative lawful representation.

# Scanfil - Supplier Code of Conduct

---

## **B. HEALTH AND SAFETY**

*Scanfil's suppliers shall provide a safe and healthy workplace that prevents injuries and illnesses, supports worker wellbeing, and incorporates worker input.*

### 1. Occupational Health & Safety

Suppliers shall identify and control workplace hazards using the Hierarchy of Controls. When risks remain, appropriate PPE (personal protective equipment) and training must be provided. Gender-responsive measures shall protect pregnant and nursing workers.

### 2. Emergency Preparedness

Suppliers must identify potential emergencies and implement plans, training, and annual (or legally required) drills. Facilities shall have proper fire protection, clear exits, emergency contacts, and recovery procedures.

### 3. Occupational Injury & Illness

Procedures must exist to prevent, track, and investigate injuries and illnesses, provide treatment, and implement corrective actions. Workers may remove themselves from imminent danger without retaliation.

### 4. Industrial Hygiene

Exposure to chemical, biological, and physical hazards must be assessed and controlled. When needed, suppliers shall provide free, well-maintained PPE and conduct regular health and workplace monitoring.

### 5. Physically Demanding Work

Risks from heavy, repetitive, or physically strenuous tasks must be identified, evaluated, and controlled.

### 6. Machine Safeguarding

Machinery shall be assessed for safety risks and equipped with guards, interlocks, and barriers.

### 7. Sanitation, Food & Housing

Workers shall have clean toilets, potable water, and sanitary eating areas. Dormitories must be clean, safe, and offer adequate space, ventilation, lighting, hot water, secure storage, and proper emergency egress.

### 8. Health & Safety Communication

Suppliers must provide workers with hazard information and training in a language they understand. Training shall be given before work begins and regularly thereafter. Workers may raise concerns without retaliation.

# Scanfil - Supplier Code of Conduct

---

## **C. ENVIRONMENT**

*Suppliers must recognize environmental responsibility as essential and work to identify and reduce environmental impacts, protecting communities, natural resources, and public health.*

### 1. Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept current and their operational and reporting requirements shall be followed.

### 2. Pollution Prevention and Resource Conservation

Waste and emissions must be minimized through process optimization, recycling, and resource efficiency.

### 3. Hazardous Substances

Hazardous materials must be labeled and safely handled, stored, tracked, and disposed of.

### 4. Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Waste data shall be tracked and documented.

### 5. Air Emissions

Air emissions—including Volatile Organic Chemicals, aerosols, corrosives, particulates, ozone-depleting substances, and combustion byproducts—shall be characterized, routinely monitored, controlled, and treated before release. Ozone-depleting substances must be managed in line with the Montreal Protocol and all applicable regulations. Suppliers shall regularly monitor the performance of their air-emission control systems.

### 6. Materials Restrictions

Supplier shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal. Upon request, supplier shall provide a Full Material Declaration of material and substances used in products.

### 7. Water Management

Suppliers should maintain a water management program that documents and monitors water sources, use, and discharge, seeks opportunities to conserve water, and prevents contamination. All wastewaters must be properly characterized, monitored, controlled, and treated before discharge or disposal. Suppliers shall routinely check the performance of their wastewater treatment and containment systems to ensure proper function and regulatory compliance.

### 8. Energy Consumption and Greenhouse Gas Emissions

Suppliers shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. Suppliers shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

# Scanfil - Supplier Code of Conduct

---

## **D. ETHICS**

*Scanfil's suppliers must meet high ethical standards and act responsibly in all business activities.*

### 1. Business Integrity

Suppliers must act with honesty and uphold a zero-tolerance approach to bribery, corruption, extortion, embezzlement, any form of human trafficking or forced labor, or procure commercial sex acts in connection with work performed for Scanfil. Destroying or withholding identity documents is prohibited.

### 2. No Improper Advantage

Suppliers may not offer, give, request, or accept anything of value to gain an improper business advantage. This includes indirect payments through third parties. Appropriate control must be in place to ensure compliance with anti-corruption laws.

### 3. Disclosure of Information

Business dealings must be transparent and recorded accurately. Suppliers must disclose information on labor practices, health and safety, environment, business structure, financial status, and performance as required. Falsifying records is forbidden.

### 4. Intellectual Property

Suppliers must respect intellectual property rights and protect customer and supplier information, including during technology or know-how transfers. Refer to the Scanfil NDA for related requirements.

### 5. Fair Business Practices

Suppliers must follow fair business, advertising, and competition standards.

### 6. Protection of Identity & Non-Retaliation

Suppliers shall maintain effective processes and reporting channels that enable employees and business partners to confidentially raise concerns in their own language, without risk of retaliation.

### 7. Responsible Sourcing of Minerals

Suppliers must follow a due-diligence process for sourcing tin, tungsten, tantalum, gold, and cobalt in line with OECD guidelines or an equivalent framework.

### 8. Privacy

Suppliers must protect personal data and comply with applicable privacy and information-security laws throughout the data lifecycle.

# Scanfil - Supplier Code of Conduct

---

## **E. CYBERSECURITY & DATA PROTECTION**

*Suppliers must protect systems and data, report incidents quickly, safeguard confidential information, store and delete data securely, ensure subcontractor compliance, and follow applicable cybersecurity and privacy laws*

### 1. Information Security & Risk Management

Suppliers shall maintain an information security program that protects systems and data against unauthorized access, alteration, and loss. Controls must follow recognized standards (e.g., ISO 27001, NIST). Suppliers must assess cyber risks regularly and apply security patches promptly.

### 2. Incident Detection & Reporting

Suppliers shall monitor security incidents and respond effectively. Any actual or suspected incident affecting Scanfil's data or systems must be reported without delay (**information.security@scanfil.com**), with full cooperation in investigation and remediation.

### 3. Protection of Confidential Information

Suppliers must safeguard Scanfil's confidential information and intellectual property, using controls such as encryption, access management, and secure authentication. Information may only be used or shared as needed to fulfill contractual obligations.

### 4. Data Storage, Retention & Disposal

Scanfil data may only be stored on secure, approved systems. Storage on personal devices or uncontrolled cloud services is prohibited. Data must follow Scanfil's retention rules and be securely destroyed when no longer needed or upon request.

### 5. Subcontractors & Third Parties

Suppliers shall ensure that any subcontractors with access to Scanfil information follow cybersecurity standards equally stringent as this Code. Suppliers remain responsible for their performance.

### 6. Compliance & Audit Rights

Suppliers must comply with all applicable laws on information security, data protection, and privacy. Scanfil may verify compliance through assessments or audits with reasonable notice.

# Scanfil - Supplier Code of Conduct

---

## **F. MANAGEMENT SYSTEMS**

*Suppliers shall have a management system that ensures legal compliance, alignment with international standards as described in this code, risk control, and continuous improvement.*

### 1. Company Commitment

Establish clear policies on human rights, health and safety, environment, and ethics, approved by management and communicated to workers.

### 2. Accountability

Assign senior leaders responsible for the management system and review its performance regularly.

### 3. Legal & Customer Requirements

Maintain processes to identify and follow all relevant laws, regulations, and customer requirements.

### 4. Risk Management

Identify and assess risks related to compliance, environment, health and safety, labor, and ethics, and implement appropriate controls.

### 5. Improvement Goals

Set measurable objectives and regularly review progress.

### 6. Training

Provide training so workers and managers understand policies, procedures, and legal requirements.

### 7. Communication

Communicate policies, expectations, and performance clearly to workers, suppliers, and customers.

### 8. Engagement & Remedy

Enable ongoing dialogue with workers and stakeholders and provide safe channels for grievances without retaliation.

### 9. Audits

Suppliers shall regularly self-evaluate to ensure they comply with laws, and customer requirements on social and environmental responsibility.

### 10. Corrective Actions

Suppliers shall establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

# Scanfil - Supplier Code of Conduct

---

## 11. Documentation

Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

## 12. Supplier Responsibility

Communicate these Code requirements, or similar, to your own suppliers and monitor their compliance.

***We have read and understand the Scanfil's Supplier Code of Conduct, and do hereby agree with and undertake to comply with this Code:***

---

**Place**

---

**Date**

---

**Supplier Company name**

---

**Supplier Company registration no**

---

**Authorized Signature**

# Scanfil - Supplier Code of Conduct

---

## REFERENCES

The following references were used in preparing this Code and may be useful sources of additional information. The following references may or may not be endorsed by each Participant:

### Standards and Conventions:

- [ILO Fundamental Conventions](#)
  - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87)
  - Right to Organise and Collective Bargaining Convention, 1949 (No.98)
  - Forced Labour Convention, 1930 (No.29)
  - Abolition of Forced Labour Convention, 1957 (No.105)
  - Minimum Age Convention, 1973 (No.138)
  - Worst Forms of Child Labour Convention, 1999 (No.182)
  - Equal Remuneration Convention, 1999 (No.100)
  - Discrimination (Employment and Occupation) Convention, 1958 (No.111)
  - Occupational Safety and Health Convention, 1981 (No.155), and the Promotional Framework, 2006 (No.187)
- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [United Nations \(UN\) Guiding Principles on Business and Human Rights](#)
- [Universal Declaration of Human Rights](#)
- [United Nations Convention Against Corruption](#)
- [United Nations Convention on the Rights of the Child](#)
- [United Nations Convention on the Elimination of All Forms of Discrimination Against Women](#)
- [United Nations Global Compact](#)

### Other Useful References:

- [Dodd-Frank Wall Street Reform and Consumer Protection Act](#)
- [Eco Management & Audit System](#)
- [Ethical Trading Initiative](#)
- [ILO Code of Practice in Safety and Health](#)
- ISO 14001 and related standards – Environmental management
- ISO 45001:2018 - Occupational health and safety management systems
- [National Fire Protection Association](#)
- Social Accountability International (SAI) o SA 8000
- [United States Federal Acquisition Regulation](#)
- <https://www.responsiblebusiness.org>