

Mint of Finland

Business Partner Code of Conduct

1. Introduction

Mint of Finland Ltd. (hereinafter “MoF”) wants to be an interesting and reliable business partner and to conclude enduring and long-term cooperation agreements with its suppliers, agents, service providers and subcontractors (hereinafter “Business Partner(s)”).

This Business Partner Code of Conduct describes the values according to which MoF expects every Business Partner and their employees to act globally when providing products or services to MoF and its subsidiaries or other affiliates. In this regard, the Business Partner shall provide its written assurance of its full compliance with the terms and conditions of this Business Partner Code of Conduct.

Business Partner shall give the largest possible scope of application to the present Code of Conduct. In particular, they shall disseminate this Code on Conduct internally and within their subsidiary companies and controlled entities as well as with their suppliers, agents and consultants.

2. General requirements

MoF’s Business Partner, their subsidiary companies and controlled entities, their directors, officers, employees and others acting on their behalf shall, as a minimum standard, comply with ethical working methods, all valid and applicable laws of countries or territories in which they operate, as well as with international regulations and conventions, in particular in relation with integrity matters.

- 2.1 Comply with all applicable laws, rules and regulations
- 2.2 Treat others justly and respectfully
- 2.3 Prepare all documents concerning monetary transactions carefully and accurately
- 2.4 Report on the financial situation and the results of functions honestly and precisely
- 2.5 Behave honestly and fairly with principals, customers, suppliers, agents and economic partners
- 2.6 Avoid actual and potential conflicts of interest
- 2.7 Avoid inappropriate giving and receipt of gifts or other payments or promises thereof to unjustly influence public officials, the judiciary and/or private parties
- 2.8 Respect and protect MoF’s property and intellectual property rights
- 2.9 Respect and protect confidential information

- 2.10 Respect and protect MoF's reputation
- 2.11 Separate personal political activities from MoF's business operations. Business Partner may not make donations or contributions to political purposes. Business Partner may not use MoF's name in political activities or purposes.

3. Labour

- 3.1 MoF expects its Business Partner to treat their employees justly and equally with a respectful and dignified manner. MoF is committed to promoting equality in working life, which means that all kinds of discrimination are prohibited. MoF approves and values diversity and expects the same of its Business Partner. MoF strongly believes that equality is both an ethical standard and a basic human right. MoF does not approve of discrimination based on race, colour, gender, age, religion, political opinions, nationality, ethnic background or any other personal characteristic of an individual.
- 3.2 MoF does not approve of child or forced labour under any conditions and does not enter into agreements with Business Partner that use or benefit from child or forced labour. The minimum age for employment shall not be less than the minimum age of completion of compulsory schooling and, in any case, shall not be less than 15 years (or 14 years where established by national laws). In any case a young person under the age of 18 may not perform work that might jeopardize their health or safety.
- 3.3 MoF strongly believes that every employee has the right to a safe and healthy working environment and to inviolable personal integrity. All kinds of harassment, regardless of purpose, whether direct or indirect, physical or verbal, sexual or for bullying purposes or in any other form are prohibited. MoF expects its Business Partner to ensure that all their employees can work in an environment free from harassment. Furthermore, Business Partner shall provide an environment at the workplace that allows employees to raise their concerns without fear of retaliation.
- 3.4 MoF's Business Partner shall ensure that the compensation paid to employees complies with all applicable laws and regulations concerning wages and remuneration. Employees shall be entitled to minimum wages, compensation based on overtime and other mandatory benefits pursuant to applicable laws and possible industrial standards and regulations.
- 3.5 MoF's Business Partner shall ensure that employees have the right to associate freely, form and join employee unions/organizations, seek representation and participate in collective bargaining in accordance with applicable laws and regulations. Employees who exercise their aforementioned rights in accordance with the applicable laws and regulations shall not be subject to pressure or other unaccepted behaviour by the Business Partner.
- 3.6 MoF's Business Partner shall ensure that working hours shall not exceed the maximum working hours permitted by applicable laws and regulations. During working hours regular and appropriate break periods shall be provided and the employee's shall be entitled to vacations and other leaves from work in accordance with the applicable laws and regulations.

4. Health and safety

As MoF, Business Partner shall undertake to offer their employees a healthy and safe workplace and to treat them justly in compliance with applicable laws. This shall include but is not limited to protection from potential safety and health hazards, providing the employees with the protective equipment and training necessary to perform their work tasks safely and implementing adequate health and safety policies. Health, safety and other standards concerning the workplace shall comply with all applicable laws and safety regulations. If company-owned housing is arranged, it must meet the same health and safety standards as the workplace.

5. Environment

MoF actively looks for Business Partners that are committed to environmental protection. Business Partner shall at minimum comply with all applicable national, regional and local environmental laws including but not limited to obtaining and maintaining all required environmental permits and registrations. MoF gives priority to Business Partner that undertake measures beyond legal requirements in order to protect and preserve the environment and improve the environment by, for example, saving energy, recycling and disposing of waste in a correct manner, using resources more efficiently, and participating in voluntary environmental remediation.

6. Anti-corruptive standards

MoF reaffirms its continued dedication to contribute to a market place free of corruptive practices, allowing all participants in the international market to compete on an equal and fair basis. MoF expresses its commitment to observe and apply the anti-corruption rules embedded in Finnish national legislation, the 1997 OECD Convention, UK Bribery Act, U.S. Foreign Corrupt Practices Act, as well as any other applicable law.

Prohibition of corruptive practices

Corruption, under any form of offering, promising or giving a bribe or any undue pecuniary or other advantage (active corruption), as well as under the guise of soliciting, demanding or extorting the same (passive corruption), distorts competition in the markets, is a criminal offence and must therefore be unequivocally condemned.

Public corruption (bribing of national, foreign or international public officials), as well as private-to-private corruption (corruption between private commercial or non-commercial entities), in order to obtain or retain business or other improper advantage (e.g. in connection with regulatory permits, taxation, customs, or judicial and legislative proceedings) must be banned from economic life.

Business Partner shall therefore abstain in all circumstances from all forms of direct and indirect corruption, through subsidiary companies, controlled entities and subcontractors. They shall take, in particular, all reasonable measures within their power to avoid that money or other advantages are illicitly channeled by direct or indirect means to a public official.

Business Partner commits to ensure that no part of any payment originating from MoF will be passed on as a bribe. This also applies to so-called "facilitation payments" (e.g. illegal payments to accelerate administration matters.)

Gifts and Hospitality

Provision of a gift or hospitality to any third party or to a MoF employee by way of a business courtesy may only be done if it:

- does not violate any applicable local or international laws or regulations.
- is not done with an intent to improperly influence the recipient or for any improper purpose;
- is customary, reasonable and proportionate in value and frequency.
- does not occur during a tender, procurement, audit process, legal proceedings, authorization processes or sensitive negotiations.
- is recorded fairly and accurately in the books and records of the giver and in a manner which permits reasonable traceability.

Governmental customers and dealing with authorities

Businesses dealing with governments and government officials on MoF's behalf carry additional risk and Business Partners are expected to be especially vigilant in this area. Business Partner shall consistently comply with the strict legal provisions when dealing with governments, authorities, and public institutions. When taking part in a public solicitation for bids, they strictly comply with all local and international laws and regulations and abide by the rules of free and fair competition in the strictest manner.

Use of agents, consultants or intermediaries

Agents, consultants or intermediaries are an effective means of developing, expanding and maintaining Business Partner's business. However, if not carefully selected or if inappropriately managed, agents, consultants or intermediaries may create considerable harm to a reputation or may even trigger judicial proceedings, even if the Business Partner would be unaware of any impropriety.

Each Business Partner shall pay therefore particular attention to the integrity profile of their agents, consultants or intermediaries, before concluding any agreement or dealing in any way with them. Business Partner shall conduct a thorough due diligence examination, using various information sources and records to assess their own business partners business and available personal standing. Such assessment shall be periodically renewed.

Business Partner's agents, consultants and / or intermediaries shall be made aware of the present Business Partner Code of Conduct, a copy of which shall be provided to him or her.

7. Data security and privacy

Business Partner must have appropriate information security policies and procedures in place to secure access to MoF information. Business Partner must notify MoF promptly of any actual or suspected privacy breaches, security breaches, or losses of our information. Business Partner shall observe all laws in force to protect the personal data of employees, customers, suppliers, and other parties concerned.

8. Fair competition

Business partner shall comply with the antitrust legislation in force. In particular, they do not enter into any anti-competitive agreements with competitors, suppliers, or customers. If they are in a dominant position on the market, they do not abuse this position.

9. Minerals from Conflict-Affected and High-Risk Areas

In case the Business Partner is involved directly or indirectly with the supply chain of conflict minerals, the Business Partner shall have follow Mint of Finland Conflict Minerals Policy and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (see <http://www.oecd.org/corporate/mne/mining.htm>), or equivalent principles concerning preventing harmful effects related to minerals from conflict-affected and high-risk areas. Conflict minerals are gold, tantalum, tin and tungsten, extracted in a conflict-affected and high-risk areas.

The Business Partner demands and monitors the use of these principles in its supply chain. The Business Partner seeks to minimise the use of conflict minerals. The Business Partner strives to that the enterprises in its supply chain, and the Business Partner itself, will purchase the conflict minerals only from responsible smelters. Responsible smelters can be identified by using lists provided by third parties, such as: <http://www.responsiblemineralsinitiative.org/conformant-smelter-refiner-lists/>.

10. Management commitment

MoF requires that its Business Partner establishes a management system which ensures compliance with international standards, applicable laws, regulations and requirements related to MoF's Business Partners' actions, products and management of operational risks. The system must facilitate continuous development and improvement of operations and it must include at least the following elements:

- 10.1 Statements of the company's corporate social responsibility and environmental responsibility that confirm the commitment of the Business Partner to complying with legal requirements and continuously improving its operations.
- 10.2 The Business Partner shall clearly notify its representative(s) who is/are responsible for the implementation and regular monitoring of the management system.
- 10.3 The Business Partner shall identify, monitor and understand applicable laws, regulations and customers' requirements regarding corporate responsibility.
- 10.4 A process to identify risks related to the operational processes, environment, health and safety and labour practices and to manage them.
- 10.5 Regular self-assessments that ensure compliance with its own processes, legal and regulatory requirements, this Code of Conduct and customer agreement provisions related to corporate social and environmental responsibility.

11. Monitoring and reporting

MoF reserves the right to review or audit Business Partner's compliance with this Code and the organisation's system of ethics and compliance controls and management oversight.

If a Business Partner becomes aware of any potential problems or incidents that happen during its conduct of business with or on behalf of MoF that may lead to a conflict or breach of the guidelines set out in this Code, MoF expects to be notified by such

Business Partner, as soon as possible, to enable the MoF and the Business Partner both to promptly take appropriate corrective action.

MoF may require corrective and remedial actions from Business Partner and also reserves the right to terminate our relationship for breaches of this Code.

Business Partner should promptly report violations of this Code or any unethical behavior to a MoF manager. If this is not feasible, Business Partner may report anonymously through independent whistleblowing channel, a link to which is available at MoF website: <https://www.rahapaja.fi/en/corporate-responsibility/whistleblowing/>

12. Approval of the Business Partner Code of Conduct

We, in the capacity of a Business Partner confirm that we have read MoF's Business Partner Code of Conduct and that we hereby understand, accept and will comply with this Code of Conduct.

We undertake to do the following:

- 12.1 Identify such areas of our own operations or those of our subsidiaries, suppliers and agents' that do not correspond with MoF's Business Partner Code of Conduct.
- 12.2 Implement such improvements through which we can comply with MoF's Business Partner Code of Conduct.
- 12.3 Supervise compliance with MoF's Business Partner Code of Conduct.
- 12.4 At MoF's request, prepare and submit a report that indicates any actions taken and the progress we have made concerning meeting the requirements of MoF's Business Partner Code of Conduct.
- 12.5 When MoF so requests, provide MoF and/or its external auditors access to audit process in order to assess compliance with the Code of Conduct, including but not limited to with access to such essential documents on the basis of which MoF may verify the correctness of the information submitted to MoF.