

Policy for reporting misconduct

1. Introduction

Verkkokauppa.com Oyj's ("Verkkokauppa.com" or the "**Company**") Code of Conduct explains our expectations for doing business responsibly, ethically, and consistently, according to our values, our policies, and the law.

Transparency is one of our values. We encourage everyone to raise their concerns and ask for advice in any unclear situations. To enable this, our personnel and external stakeholders have access to several feedback and reporting channels.

This Policy describes how employees, customers, and other stakeholders can report activity that they suspect to be in violation of any applicable law or Verkkokauppa.com's Code of Conduct or other company policies. This Policy also describes how the Company will act upon receiving such a report.

2. Scope

This Policy describes how to report any observed or suspected misconduct in the Company's operations.

2.1 This Policy applies to reporting misconduct. For the purposes of this Policy, the term "**misconduct**" means:

- any severe violation of the Company's Code of Conduct or policies supplementing the Code; and
- all violations of law.

Examples of misconduct covered by this Policy include:

- human rights violations
- bribery and corruption
- unauthorized use or disclosure of confidential information
- violations of money laundering or sanction laws
- insider trading or misuse of inside information
- discrimination or harassment
- financial crime such as fraud or accounting offence
- environmental, health, and safety violations

2.2 This Policy and the reporting procedures described herein are **not** applicable in the following circumstances:

Customer complaints: Customer claims, complaints, and other similar feedback made by our customers should primarily be directed to our customer service.

Personnel matters: If you are an employee of the Company and your matter concerns normal personnel management issues related to your own employment, such as working hours, salary questions, or vacation arrangements, please contact the Company's HR department.

Immediate threat to somebody's life, health, property, or the environment: If you have an emergency or need urgent assistance from the authorities (such as police, emergency medical services, fire and rescue services, or social services), call the emergency number 112.

3. Channels for reporting misconduct

If you become aware or suspect misconduct in Verkkokauppa.com's operations, please act as follows:

- **Alternative 1: The employee can report the matter to their supervisor**

If you are an employee of the Company with a concern of misconduct relating to the Company, you should primarily contact your supervisor. Our supervisors have a responsibility to listen carefully to the concerns of their team members and to create an environment in which employees feel safe to express their views and ask questions. Supervisors also have a duty to take forward any concerns brought to their attention. In case you believe that your supervisor has failed to take your concern forward, you may escalate this as stated below in alternatives 2 or 4.

- **Alternative 2: The employee can report the matter to the Company's HR or other relevant department**

You may also choose to discuss your concern of misconduct with a representative of the Company's HR, Legal, Finance, or other relevant department. The relevant department can respond to your concern or take the matter forward on your behalf.

- **Alternative 3: The stakeholder can report the matter to their contact person at Verkkokauppa.com or Company management**

We encourage our stakeholders to discuss any potential concern of misconduct primarily with their contact person at Verkkokauppa.com. If the stakeholder so wishes, a report can also be made to the Company's management.

- **Alternative 4: The employee or stakeholder can report the matter through the Company's reporting channel**

If you suspect misconduct and believe that the matter cannot be dealt with through other available channels, you can use our external reporting channel to raise concerns confidentially and, if you wish, anonymously and without contact information.

The reporting channel is hosted by an independent third party. A report can be submitted through the reporting channel at <https://www.firstwhistle.fi/verkkokauppa.com>.

4. Reporting in bad faith

It is prohibited to make reports maliciously or otherwise in bad faith. If an employee of the Company abuses the reporting procedures described in this Policy by knowingly providing false information, they commit a serious disciplinary offense, which may lead to disciplinary action, up to and including termination.

5. Review and investigation of reports

Verkkokauppa.com follows a two-phased approach when handling reports of misconduct:

- **Initial review:** The report is assessed to determine whether it requires further review and investigation (and if so, by whom and in which form). The reporting person may be approached for additional information.
- **Investigation:** Based on the outcome of the initial review, the report may be assigned to a case manager for further investigation. The investigation is an objective, factual analysis of the case. If needed, outside experts (e.g. lawyers or auditors) can be engaged to assist in the investigation. They work under strict confidentiality.

Review and investigation are conducted in an independent, fair, and unbiased manner with respect to all parties involved, in accordance with relevant laws and principles (including fair hearing), and as soon

as reasonably practicable, taking into account the complexity and the nature of the issue. The person under suspicion will not be involved in the investigation of the report.

Everyone approached in connection with an investigation is expected to cooperate and answer all questions comprehensively and honestly. All parties involved, including the accused, are entitled to confidentiality in order to avoid unnecessary harm to them.

The reporting person will be informed of the overall findings of the review or investigation. Please note that Verkkokauppa.com may not be able to give the reporting person full details of the outcome of the case or the actions taken as a result of the case for reasons of confidentiality, privacy, and the legal rights of all concerned.

All reports made through the external reporting channel will be made available to and reviewed by the Company's CFO, Chief HR Officer, and Head of Legal (the "**Compliance Officers**"). The Compliance Officers will inform the Company's CEO and Audit Committee of all reports of misconduct they have received.

6. Protection and rights of the reporting persons

The identity of all reporting persons will be protected to the extent possible. This means that information about any report will only be shared with a limited number of people within the Company on a strict need-to-know basis. Information will only be disclosed outside this small group, for example to a competent authority, if Verkkokauppa.com is required to do so by law or an important public interest is at stake.

Concerns of misconduct can also be reported anonymously. However, you are encouraged to reveal your identity as it is more difficult, and in some circumstances even impossible, for Verkkokauppa.com to investigate reports that are made anonymously.

The Company has a strict policy of non-retaliation against anyone who raises a compliance concern in good faith. Becoming a reporting person does not, however, automatically grant immunity for one's own misconduct.

The Company also prohibits any form of retaliation against its employees who provide information, cause information to be provided, or assist in an investigation conducted by the Company or any competent authority in relation to an alleged misconduct.

If you notice any retaliation against you or against anyone else for raising or having raised a concern in good faith about suspected misconduct, report this via one of the channels described in this Policy. A report on retaliation is treated like any other report made under this Policy.

7. Protection and rights of the accused

The Company will inform the person who is the subject of a complaint as soon as possible that a report has been made about them. However, notification may be delayed for a justified reason, such as if there is a risk of obstructing the investigation or destroying evidence.

The person suspected of misconduct has the right to file a complaint about being under investigation and can seek redress from the Company's Compliance Officers.

8. Deletion of data from the reporting channel

Any information reported through the external reporting channel will be deleted after five (5) years from receiving the report, unless further retention is necessary for the purposes of ensuring criminal investigations, pending court proceedings or authorities' investigations or to protect vital interests and rights of the reporting or reported person.

Personal data contained in the reports form a personal data file. The personal data may include e.g. the name and/or contact details of employees or external individuals. A data protection statement (Finnish:

tietosuojaseloste) is available at the Company's headquarters at Tyynenmerenkatu 11, 00200 Helsinki or on its website. The data subjects (i.e. the persons whose personal data is in the data file) may have the right to review their personal data contained in the register, unless the review of information would encumber the investigation of suspected infringements. Persons also have the right to have their false or incorrect information corrected or provide a complaint to the Data Ombudsman.

9. Further information

Any questions regarding this Policy are to be raised with the Company's Head of Legal.

10. Validity

This Policy has been approved by the Board of Directors on 27 March 2025 and enters into force on 1 April 2025. This Policy replaces and supersedes the Policy for Reporting of Infringements Relating to Financial Markets Regulations, Anti-Money Laundering and Terrorist Financing or other suspected irregularities approved in March 2020.