

# Pomppa Code of Conduct

In Pomppa, we strongly believe that business can be sustainable and have a positive impact on people, planet, and economy through its value chain. Operating in the pet industry also means that animal welfare is especially important to us.

This Code of Conduct defines the binding requirements for Pomppa and its employees and its business partners, particularly suppliers and their subcontractors (later referred to as "We"). Pomppa's direct suppliers are responsible for committing their subcontractors to these principles. Pomppa reserves the right to make reasonable changes to the requirements of this Code of Conduct and expects the supplier to accept the changes made.

To monitor our business partners' conformity with requirements of this Code of Conduct, we shall have the right to make unannounced visits to all units producing goods for Pomppa. We also reserve the right to appoint an independent third party to conduct audits to evaluate compliance with this Code of Conduct. All suppliers are obliged to keep Pomppa informed about where each order is produced.

# Legal requirements

We, Pomppa and its business partners, must comply with the national and international laws in the countries we operate. Committing to this document may require us to go beyond the requirement set out in national law.

# Zero tolerance for corruption and bribery

We do not give or take bribes. We do not let gifts or hospitality influence our judgment and we do not accept anything of value that is not reasonable in size. Personal or family benefits do not impact our decision making.

# Respecting human rights

Anyone who works for Pomppa, directly or indirectly, is entitled to basic human rights and the dignity of the individual, according to the United Nations Universal Declaration of Human Rights. We do not accept any form of forced, bonded or non-voluntary labor. We are committed to fair employment practices that are fair, merit-based and nondiscriminatory, which includes hiring practices. We treat everyone with respect, and do not discriminate anyone based on their gender, age, religion, race, pregnancy, disability, social background, sexual orientation, political opinions, disease, or any other condition that could give rise to discrimination. Employees are provided with a written contract that includes the terms and conditions of the employment. Contract is written in the local language to ensure that employees are aware of their legal rights and obligations.

### Fair wages and working hours

At Pomppa we firmly believe that every employee should earn a living wage. We pay at least the statutory minimum wage, the prevailing industry wage or the wage negotiated in a collective agreement, whichever is higher. Wages are paid regularly on time, refer to regular working hours and reflect the skills, education, and experience of the employee. A normal workweek does not exceed the legal hourly limit. Overtime work is exceptional, always voluntary for employees and compensated in accordance with the law. We grant our employees the right to resting breaks every working day and the right to at least one day off every seven days. Our employees are also granted with stipulated annual leave; sick leave and maternity/paternity leave without any form of repercussions.

# Free association of employees

We respect the employees right to form or join associations of their own choosing and bargain collectively. We do not discriminate against employees because of trade union membership.

When operating in countries where trade union activity is unlawful, we allow employees to freely elect their own representatives with whom the company can enter dialogue about workplace issues.

# **Rights of Children and Young Workers**

We do not accept child labor. We are committed to ILO conventions 138 and 182, by which no person shall be employed under the age of 15, or under the age of completion of compulsory education, whichever is higher. When we employ juvenile employees, we ensure that the kind of work is not harmful to their health and their working hours do not prejudice their attendance at school.

#### Health and safety

We ensure a clean, safe, and healthy working environment for all employees. We ensure access to clean drinking water, safe and clean cooking, eating and resting areas as well toilets, adequate for the number of our employees.

We identify potential risks and hazards in the working environment and take actions to mitigate them. We take precautionary measures against accidents, for example, by maintaining proper and adequate fire safety conditions in the workplace, and against occupational diseases.

#### **Housing Conditions**

When we provide housing facilities for our employees, it satisfies the same health and safety requirements as listed above. All residents are also provided with their own individual bed and the living space per person meets the minimum legal requirement. Dormitories, toilets and showers should be separated for men and women. There should be no restriction on employees' rights to leave during off hours.

### **Animal welfare**

We respect animal welfare and believe that all animals are entitled to species-typical behavior. We implement and use practices that are healthy and humane and prevent the mistreatment of animals at all times. We provide an environment that is free from stress, cruelty, abuse, and neglect throughout the life of the animal.

#### Environment

We do our best to minimize the possible negative environmental impacts of our operations and the products we produce and require the same from our whole supply chain. We enhance the circular economy and prefer solutions with the lowest lifetime impact on the environment. We take the environmental effects into account early on, from product design and material selections to business planning. We are resource efficient and reduce and recycle waste as much as reasonably possible.

The whole supply chain of Pomppa must comply with all environmental laws in the countries in which they operate, for example treat and dispose of all wastewaters according to the local legislation and have the relevant environmental permits for the operations. This compliance must be documented and available on request.

Pomppa Oy is committed to following EU level legislation. Please make sure that you are familiar with the regulations and fulfill the obligations accordingly, e.g. REACH.

Pomppa Oy policy is that all our material treatments should be fully PFC-free. We work hard to eliminate the use PFAS, PFOA, PFOS, PFHxA, PFHxS in the materials used in Pomppa products.

#### **Commitment to the Code of Conduct**

We are honest and we expect that all forms of communications, including statements, representations and certifications provided to us are truthful and correct. We are willing to cooperate with our suppliers to achieve adequate solutions, to take cultural differences and other relevant factors into consideration, as long as we do not compromise on the fundamental requirements described in this document.

Signing up the Code of Conduct is mandatory for Pomppa suppliers and their subcontractors, and highly recommended to all business partners having a business relation with Pomppa Oy.

Signing up the Business partners commit to comply with Pomppa's Code of Conduct and take the responsibility to inform all subcontractors about it to secure their possibility to comply.