



Supplier Code of Conduct

Basware Corporation

(Updated in 2026)

Basware Supplier Code of Conduct

Introduction

Basware is the global leader in providing AP automation, e-invoicing solutions and value-added services in the world of commerce.

This Supplier Code of Conduct sets out the common principles and standards Basware expects all its suppliers, business partners and subcontractors to follow when working for, or on behalf of, Basware.

Basware expects its suppliers, business partners, and subcontractors to comply with these principles or equivalent standards of their own.

In addition to complying with this Code, suppliers must comply with all applicable laws, rules, and regulations.

The Supplier Code of Conduct is reviewed regularly to ensure that its contents conform to the ethical and regulatory standards that are applicable to Basware at any given time.

Business Practices

Compliance with Laws and Regulations

Basware is committed to full compliance with all applicable laws, rules and regulations in all locations where Basware operates and expects the same from its suppliers. If applicable laws and regulations are more permissive than this Supplier Code of Conduct, Suppliers should comply with this Supplier Code of Conduct. If applicable laws and regulations are more restrictive, Suppliers shall comply with the legal requirements. In addition, Basware always acts in accordance with the highest standards of business ethics, and the same is expected from suppliers.

Anti-Bribery and Anti-Corruption

Basware has zero tolerance for all forms of bribery and corruption. The highest standards of integrity are to be expected from Basware's suppliers, including its sub-suppliers, and other entities acting on behalf of the supplier, in all business interactions. Any form of extortion, bribery or corruption, including improper offers of payments to or from employees or organizations, is prohibited. Basware suppliers must adhere to a zero-tolerance approach to bribery and corruption and must establish and maintain their own policies, procedures, and controls that provide an equivalent level of anti-bribery and anti-corruption compliance when acting for, or on behalf of, Basware.

Suppliers shall not provide Basware representatives with any gifts or hospitality in any situation in which it might influence, or appear to influence, a representative's decision in relation to the supplier.

Import, Export and Trade Compliance Rules

Suppliers shall comply with all applicable laws and regulations regarding import and export control and export restrictions, as well as economic sanctions imposed by the EU, US, UK or UN.

Suppliers shall not provide Basware with products or services that violate applicable import, export control or sanction laws.

Antitrust and Competition Laws

Suppliers shall comply with all applicable competition and antitrust laws in all jurisdictions in which they operate. Suppliers shall not engage in anti-competitive arrangements, including price-fixing, market



Basware Corporation
Linnoitustie 2 Cello, PL 97, FI-02601 Espoo, Finland
Visit us: **Basware.com**

allocation, bid-rigging, or other practices that restrict or distort competition, in connection with their relationship with Basware.

Anti-Money Laundering

Suppliers shall implement protective measures and refrain from any activities which may be considered part of the money laundering process. "Money laundering" is the process in which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

Political Involvement

Suppliers shall not engage in political activities on behalf of Basware or exploit the Basware relationship to promote the interests of any political party, candidate, or political institution. The Basware name, logo, or any resources provided by Basware shall not be used for political purposes.

Conflicts of Interest

Suppliers must avoid any actions or situations that could result in a potential conflict of interest or the appearance thereof. A potential conflict of interest arises when supplier interests collide with those of Basware or may be perceived to do so. Suppliers shall disclose to Basware all conflicts of interest or situations giving the appearance of a conflict of interest in its engagement with Basware.

Social Responsibility

Respect for Human Rights

Suppliers are expected to respect internationally recognized human rights including the International Bill of Human Rights consisting of the Universal Declaration of Human Rights as well as the supporting Covenants on Civil and Political Rights and Economic, Social and Cultural Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises, and the United Nations Global Compact.

Suppliers are expected to identify and assess human rights risks in own operations and supply chain, take all reasonable measures to prevent and mitigate adverse human rights impacts, and address actual and potential adverse human rights impacts, taking timely corrective action and providing or cooperating in appropriate remediation.

These human rights obligations extend to all workers engaged directly or indirectly in the supplier's operations, including temporary, migrant, agency, subcontracted, or outsourced labor.

Anti-Discrimination and Anti-Harassment

Basware expects all their suppliers to treat their employees in a fair and equal manner and ensure that people are employed based on the principle of equal opportunity. Suppliers shall not discriminate in the hiring, compensation, promotion, discipline, termination, or retirement of employees based on race, sex, religion, political opinion, disability, sexual orientation, gender identity, social status, age or ethnic origin, trade union activities, or any other characteristic that does not relate to the individual's qualifications or the inherent requirements for the job.

Suppliers shall treat their employees with dignity and respect and shall ensure that no worker is subject to any physical, sexual, psychological or verbal harassment, abuse or other form of intimidation.



Prohibition of Forced and Child Labor

Suppliers shall not use workers under the age of 15 or under the local legal minimum age for work or mandatory schooling age, whichever is higher. No young worker shall do work that is mentally, physically, socially or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school. Suppliers shall under no circumstances use forced labor (including trafficked, indentured, or bonded labor) or contract with subcontractors or suppliers using child labor or forced labor. Mental and physical coercion, slavery and human trafficking are prohibited.

Fair Wages and Working Hours

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits, including overtime pay where applicable.

Suppliers are expected to comply with International Labor Organization (ILO) standards on working and rest hours, maximum consecutive days of work, and annual leave.

Overtime shall be voluntary. Suppliers must provide employees with a rest period of at least 24 consecutive hours in every seven-day period and allow them to communicate openly with management about working conditions without fear of retaliation.

Freedom of Association and Collective Bargaining

Suppliers shall recognize and respect any rights of workers to exercise lawful rights of free association without fear of harassment, intimidation, penalty, interference or reprisal, including joining or not joining any association of their choosing within the appropriate national legal framework.

Health and Safety

Suppliers shall provide a safe and healthy workplace and take proactive measures to prevent occupational injuries, illnesses, and accidents.

Suppliers are expected to identify and mitigate occupational hazards, provide necessary information, training and personal protective equipment to their employees, and have appropriate safety programs in place covering at least human safety, emergency preparedness procedures and exposure to dangerous chemicals, biological substances, epidemics and pandemics.

Environmental Responsibility

Respect for the Environment

Suppliers shall comply with all applicable environmental laws and regulations as well as any reasonable Basware requirements regarding the prohibition, restriction, labeling for recycling or disposal of specific substances. Suppliers shall obtain, maintain, and comply with all environmental permits, licenses and registrations necessary for their operations.

Suppliers are expected to make all reasonable efforts to protect the environment, and to minimize any negative environmental impact of its activities. Suppliers are expected to monitor, control, minimize and appropriately treat emissions and pollutants (to air, soil, and water) and other waste generated from its operations. Suppliers should make reasonable efforts to continuously reduce the carbon footprint of its operations through actions such as improving energy efficiency, sourcing renewable energy, and eliminating, reducing, and recycling waste.

Suppliers are expected to have an appropriate, structured, and systematic approach to managing its environmental responsibilities that includes, if applicable, establishing a suitable environmental management system.



Energy Use and Emissions

Suppliers should make all reasonable efforts to reduce greenhouse gas emissions.

For energy-intensive sectors (e.g., cloud hosting, data centers, compute-intensive software), suppliers are expected to measure, disclose and reduce energy consumption and GHG emissions, use renewable energy where feasible, set measurable targets for emissions reduction, and optimize infrastructure and computing efficiency. These expectations apply regardless of whether the Supplier operates proprietary infrastructure or uses third-party hosting.

Resource Efficiency and Waste Management

Suppliers should use natural resources efficiently and minimize the generation of landfill waste and incineration. Suppliers handling electronic equipment, hardware, network components, or devices are expected to minimize e-waste and avoid premature obsolescence, encourage repair, refurbishment and circularity, and use responsible recycling and disposal processes.

Hardware suppliers are expected to align with the OECD Due Diligence Guidance for Responsible Mineral Supply Chains and ensure responsible sourcing of 3TG and other critical minerals.

Water Stewardship

Suppliers operating in water-intensive sectors (e.g., electronics manufacturing, data centers) are expected to minimize water consumption (e.g. water use in data center cooling processes), prevent water pollution, and ensure that wastewater discharges meet applicable legal and environmental standards.

Information Security and Data Protection

Compliance with Data Protection and Privacy Laws

Suppliers must comply with all applicable data protection and privacy laws and regulations, including requirements relating to the collection, use, storage, transfer, and deletion of personal data. Personal data shall be processed lawfully, fairly, and transparently and only to the extent necessary for legitimate business purposes.

Information Security Controls

Suppliers shall implement appropriate technical and organizational security measures to protect information assets, including personal data and confidential business information. Such measures should be proportionate to the nature of the data and risks involved and may include access controls, encryption, network security, vulnerability management, and regular security testing.

Suppliers must have procedures in place to detect, respond to, and mitigate data breaches and information security incidents. Any actual or suspected breach involving personal data or confidential information related to the business relationship must be reported without undue delay and managed in accordance with applicable laws and contractual obligations.

Confidentiality and Use of Information

Suppliers shall protect all confidential and proprietary information received during the business relationship and use such information solely for authorized purposes. Confidential information shall not be disclosed to third parties without proper authorization, unless required by law. Suppliers shall comply with all applicable laws and international treaties on intellectual property rights. Suppliers shall not infringe Basware's or any third party's intellectual property rights.



Personal Data Protection

Where suppliers process personal data on behalf of the contracting company, they shall do so only in accordance with documented instructions and applicable contractual requirements. Suppliers must ensure that personal data is accurate, kept up to date where necessary, and retained only for as long as required for its intended purpose.

Compliance and Continuous Improvement

Suppliers shall monitor compliance with this Code and cooperate with Basware in verifying compliance with this Code, including providing information upon request precisely and in a timely manner, participating in Basware's due diligence processes, including self-assessments, cooperating with audits or assessments when applicable and taking prompt corrective action when non-compliance is identified. Suppliers shall maintain accurate and complete books and records for all transactions relating to their business relationship with Basware and shall make such records available to Basware upon reasonable request.

Raising Concerns

Any violation of the principles defined in this Supplier Code of Conduct should be reported to Basware immediately. Reports can be made to your Basware contact person or through the below options.

The supplier or any of its employees may also report any violation or suspected violation of this Supplier Code of Conduct by using the online [whistleblowing channel](#). The identity of the person making the report will be confidential and known only to the people necessary to ensure that the case is handled properly. It is also possible to make the report anonymously, and retaliation against individuals reporting concerns is strictly prohibited.

Questions

If suppliers have any questions about the requirements of this Supplier Code of Conduct, need guidance regarding the proper conduct in a certain situation, or other assistance is needed to take the appropriate action, please contact your Basware relationship manager or reach out to the global sourcing department at Global.sourcing@basware.com.

Note: Basware will consider a violation of laws, this Supplier Code of Conduct or a failure to take corrective action as a material breach of contract, and this will entitle Basware to terminate the business relationship with the Supplier with prior written notice.

Basware reserves the right to the final decisions on interpretation of the terms of the policy.

