

## Vaisala Modern Slavery Statement for Financial Year 2024

This statement is made on behalf of Vaisala Ltd pursuant to section 54 of the UK Modern Slavery Act. The statement sets out the steps that Vaisala Group, including Vaisala Ltd ("Vaisala") has undertaken to ensure that modern slavery is not taking place within our business or supply chain.

Modern slavery covers all situations of exploitation that a person cannot refuse or leave, because of threats, violence, coercion, abuse of power or deception. Modern Slavery can take many forms including the trafficking of people, forced or compulsory labour, servitude, slavery and the worst forms of child labour.

At Vaisala we have a zero-tolerance approach to any form of modern slavery. We are committed to respecting human rights and acting in an ethical manner, with integrity and transparency in all business dealings.

### Vaisala in Brief

Vaisala is a global leader in environmental and industrial measurement. Our main products and services include measurement sensors, instruments, systems, software, digital solutions, and services for measuring weather, environmental, and industrial conditions and processes. Headquartered in Finland, Vaisala employs over 2,400 professionals worldwide and is listed on the Nasdaq Helsinki stock exchange. In 2024 Vaisala group's net sales were 564.6M€.

### Vaisala's manufacturing operations

Vaisala's factories operate in Finland, France, the United States, and China. We manufacture sensors for all our products in our sensor factory located in Finland. In addition, our manufacturing involves assembly, configuration, and calibration of electronic and mechanical equipment.

### Supply Chain

Our direct first tier suppliers are typically located close to our manufacturing sites. We mainly purchase subassemblies, components, and mechanical parts from Finland, other European countries, and the United States. Vaisala's products contain electronics, and the electronics upstream value chain begins with extracting raw materials, like minerals. The upstream value chain includes smelters and refineries, component manufacturers, sub-suppliers, direct material suppliers, and contract manufacturers.

### Human Rights Commitments

In accordance with the United Nations Guiding Principles on Business and Human Rights, we are committed to respecting internationally recognized human and labour rights, as outlined

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in the International Bill of Human Rights and the eight core conventions of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. These include preventing child and forced labour, respecting the freedom of association and the right to collective bargaining, and safeguarding workers from discrimination in employment and occupation.

### Vaisala Policies

We operate several policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. [Vaisala Code of Conduct](#) (Code). This Code explains the way we operate as an organization and how we expect our employees to act and behave. The Code includes human rights topics, such as forced labour and child labour. All Vaisala employees must complete a Code of Conduct training at regular intervals and confirm their commitment to the Code. Compliance with the Code is continuously monitored by regional and business unit heads, as well as immediate supervisors, while also being subject to internal audits.
2. [Vaisala Partner Code of Conduct](#) (Partner Code). We hold our suppliers, subcontractors, and business partners across the value chains to the same high standards and require them to comply with our Partner Code. The Partner Code sets out the standards required of our suppliers and other partners and is a mandatory part of supplier agreements. Partners are responsible for monitoring their compliance, providing Vaisala with information on potential violations, supplying documentation upon request, and permitting compliance monitoring by Vaisala or authorized persons.
3. [Vaisala Supplier Requirements](#). This document specifies in more detail the requirements Vaisala sets for its suppliers.

### Vaisala Statements

To enforce these Policies, Vaisala makes sure the following Statements are met in its own operations, and requires the same from all entities in its supply chain:

- We refrain from using any form of forced or child labour or engaging in human trafficking.
- We do not employ low-skilled foreign or domestic migrants.
- We do not hold onto our workers' identity papers, or work with partners that do.
- We do not demand deposits or charge any recruitment fees, such as fees for soliciting, identifying, considering, interviewing, referring, retaining, transferring, selecting, testing, training, recommending employees or potential employees.
- We do our best to ensure that the information provided during recruitment covers all the key terms and conditions from the recruit's perspective. This shall include no misleading or fraudulent practices during the recruitment process. The employment contract and other required work documents are made in written and in language that the employee understands. We provide our employees with all the required documents in a timely manner.
- We ensure that our employees work voluntarily in a safe and responsible workplace.

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- We verify that our employees are adequately educated and skilled to work in the position where we are recruiting and train them to meet our requirements for safety, security, and ethical conduct at the workplace.
- We carry out document checks to verify candidates' age and other qualifications.
- Our employees are paid regularly, in full and on time.
- We respect applicable international standards and national laws and regulations concerning maximum hours and minimum breaks and rest periods.
- We do not tolerate harassment or discrimination of our employees as detailed in Vaisala's Code of Conduct.
- We do not provide housing to our employees.

### **Risk assessment, risk management, and due diligence**

Vaisala has conducted a human rights risk assessment, identifying actual and potential human rights impacts within its operations and the value chain, and assessing the severity and likelihood of these impacts. The human rights risk assessment is reviewed and updated annually. In this assessment, we have not identified any risks related to modern slavery in our own operations. However, we have identified potential modern slavery risks, such as the risk of forced labor, in our supply chain. While these risks are deemed very unlikely among first-tier suppliers, they become more probable further up the supply chain. The likelihood for these risks is assessed to be highest beyond the third tier of suppliers, particularly in industries such as mining.

Vaisala mitigates the risks related to modern slavery in its supply chain by working closely with first-tier suppliers, ensuring they uphold human rights throughout their supply chains. We conduct thorough assessments and audits on new suppliers before approving them. Our first-tier suppliers are monitored through assessment questionnaires, audits, and ongoing dialogue with the suppliers. Additionally, we partner with EcoVadis, a leading provider of sustainability ratings, to assess our suppliers' policies and practices regarding labour and human rights as well as sustainable procurement. We also encourage our suppliers to use the assessment results to continuously improve their performance. In cases of non-conformity with Vaisala's requirements, we work together with our suppliers to help them understand how to remain in compliance with the requirements. If a breach of the Partner Code of Conduct occurs, we may ultimately terminate a supplier contract.

Vaisala provides a whistleblowing channel for its employees and external stakeholders to report any concerns about unethical or illegal activities within our business or supply chain. The channel can also be used as a grievance mechanism to report any complaints towards Vaisala and seek remedies. Vaisala is committed to ensuring that any complaints are handled promptly and without retaliation. Vaisala has never had any reported incidents of child labor, forced labor, compulsory labor, or any other type of modern slavery. Consequently, no remediation measures have been taken to address such concerns.

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**Training**

All Vaisala employees must regularly complete a Code of Conduct training, which includes human rights topics, such as forced labour and child labour. Vaisala has also provided additional training for its employees on human rights issues. The primary focus is on employees with responsibilities in Vaisala's supply chain and those who encounter these topics in their work.

**Performance indicators**

To measure the progress of our anti-slavery actions, we track the EcoVadis assessment coverage of our direct spend, which was 74% in 2024. In addition, we monitor the annual improvement of our direct suppliers' EcoVadis scores in the areas of Labor & Human Rights and Sustainable Procurement.

**Approval of this Statement**

This statement has been signed by Director Phil Griffiths and has been approved by the Board of Directors of Vaisala Ltd.

Signed



**Mr Phil Griffiths. Director** for and on behalf of Vaisala Ltd. Date: 16<sup>th</sup> April 2025

This statement has immediate effect and replaces all previous versions.

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