

PROCUREMENT POLICY

1. Purpose

The objective of Kyrel Oy's procurement function is to ensure high-quality, timely and competitive procurement for the needs of production and business operations in a responsible, transparent manner that supports business continuity.

2. Scope

This Procurement Policy applies to all procurement activities, supplier selection, supplier management and supplier relationships of Kyrel Oy.

3. Procurement Principles

Kyrel Oy conducts its procurement activities honestly, openly and fairly, and complies with applicable legislation, regulatory requirements and good business practice. In procurement decisions, sustainability aspects are considered in addition to price, quality, delivery capability and technical suitability. Kyrel Oy favors long-term cooperation with suppliers that are committed to continuous improvement, responsibility and security of supply.

4. Sustainable Procurement

Kyrel Oy requires its suppliers to operate in an environmentally and socially responsible manner and in accordance with ethical business principles. Suppliers shall comply with Kyrel Oy's supplier requirements and commit to the [Supplier Code of Conduct](#) or demonstrate compliance with an equivalent policy of their own.

The sustainability requirements cover at least:

- compliance with laws and regulations
- respect for human rights
- working conditions, occupational health and safety
- prohibition of discrimination, harassment, forced labor, human trafficking and child labor
- business ethics and the prevention of bribery and corruption
- management of environmental impacts, including energy, materials, water, emissions and waste
- appropriate protection of data, confidential information and intellectual property rights
- extending sustainability requirements to the supplier's own supply chain

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In addition, suppliers shall be expected to maintain appropriate information security and cybersecurity practices proportionate to the risks related to the products, services, data, systems and supply chains involved.

These requirements may include, where relevant:

- supply chain security and the management of cybersecurity risks related to direct suppliers and service providers
- security in network and information systems acquisition, development and maintenance, including vulnerability handling and, where applicable, coordinated vulnerability disclosure
- incident handling, business continuity and recovery capabilities
- access control, asset management and protection of information processed on behalf of Kyrel Oy
- basic cyber hygiene, relevant personnel awareness and, where appropriate, the use of cryptography and secure communication practices
- appropriate information security controls in ICT and cloud service relationships

5. Sustainability as Part of Supplier Selection and Management

Kyrel Oy evaluates suppliers and procurements on a risk-based basis. The assessment may consider, for example, the supplier's industry, location, supply chain structure, procured materials, sustainability risks, business criticality and, where relevant, information security and cybersecurity risks related to supplier access, ICT dependencies, cloud services, data processing, service continuity and the security quality of supplier products and services.

For direct suppliers and service providers relevant to Kyrel Oy's operations, the assessment may also consider supplier-specific vulnerabilities, security practices, secure development procedures, incident management capability and business continuity arrangements.

The assessment may also consider the overall quality and resilience of supplier products and services, including relevant cybersecurity practices and, where applicable, secure development procedures.

Sustainability is part of supplier selection, approval, monitoring and the continuous development of cooperation. Kyrel Oy may request from the supplier sustainability-related statements, assurances, certificates, reports or other documented evidence demonstrating compliance with the requirements.

Kyrel Oy may maintain supplier approval and review procedures that include risk-based due diligence, supplier classification, an Approved Supplier List or equivalent supplier register, and the collection of documented evidence relating to sustainability, information security and regulatory compliance requirements.

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Kyrel Oy may also review, where relevant, the continued appropriateness of supplier access, critical supplier services and the supplier's security status throughout the supplier relationship lifecycle.

6. Sustainability Clauses in Supplier Agreements

Kyrel Oy includes essential requirements related to the environment, labor and human rights, and business ethics in supplier agreements or their appendices. Supplier agreements may require the supplier to:

- commit to complying with Kyrel Oy's sustainability requirements and the [Supplier Code of Conduct](#), or equivalent requirements
- maintain procedures to implement the requirements
- provide evidence of compliance upon request
- correct any identified non-conformities within the agreed timeframe
- require its own subcontractors to comply with equivalent sustainability requirements
- maintain appropriate information security and cybersecurity controls proportionate to the risks involved
- notify Kyrel Oy without undue delay of significant information security incidents, vulnerabilities or disruptions that may affect Kyrel Oy, its data, products, services or supply chain
- manage supplier personnel access, privileged access and data access on a need-to-know basis
- provide reasonable information on the security of ICT products, services, cloud services and relevant supply chain dependencies
- notify Kyrel Oy of material changes affecting the supplier's services, subcontractors, manufacturing locations, ICT environment or security posture where such changes may affect risk
- support audits, assessments or other reasonable due diligence activities related to sustainability, information security, cybersecurity and regulatory compliance

7. Monitoring, Assessments and Audits

Kyrel Oy monitors suppliers' compliance with sustainability requirements as part of supplier management. Monitoring may include, for example, supplier assessments, self-assessments, document reviews, sustainability questionnaires, development discussions, follow-up of corrective actions and, where necessary, audits. Kyrel Oy has the right to request additional clarifications from the supplier and, where necessary, to apply enhanced monitoring to higher-risk suppliers. Where relevant, monitoring may also include reviews of supplier information security performance, incident history, business continuity capability, changes in critical supplier services, and the continued appropriateness of supplier access to Kyrel Oy information, systems or facilities.

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8. Non-Compliance and Corrective Actions

If deficiencies contrary to this Policy or contractual requirements are identified in a supplier's operations, Kyrel Oy may require a corrective action plan and verification of its implementation within an agreed timeframe. Material or repeated violations may affect supplier approval, procurement decisions, the scope of cooperation or the continuation of the contractual relationship.

9. Specific Features of Contract Manufacturing

Kyrel Oy operates as a contract manufacturer and uses manufacturers and materials specified by its customers to the extent required by customer agreements or customer requirements. Nevertheless, Kyrel Oy takes sustainability requirements into account in its own procurement in those purchasing categories and supplier relationships where the company can exercise influence, and it requires its suppliers to operate in accordance with this Policy as applicable.

10. Governance and Maintenance

This Policy is owned by the procurement function and shall be reviewed at least annually, and updated as necessary, in response to changes in business operations, customer requirements, legislation, information security requirements and sustainability requirements.

KYREL OY