

## CODE OF CONDUCT

### INTRODUCTION

This Code of Conduct applies to all Tamtron companies and their personnel, as well as Tamtron's suppliers and partners.

The code addresses Tamtron's corporate culture, commonly accepted practices, and commitment to compliance with laws and regulations. The Code of Conduct supports the company's sustainable development and success. Tamtron's employees and stakeholders are expected to adhere to it in all business activities and tasks related to the company.

The Code of Conduct provides us with the tools to make the right decisions in line with our values. It promotes ethical conduct, transparency, and accountability. Every employee of Tamtron plays an important role in ensuring that Tamtron's goals are achieved and the Code of Conduct is followed. We also encourage all stakeholders to report misconduct through Tamtron Group's Whistleblow reporting channel.

#### **OUR VALUES:**

##### **Customer Success**

We strive to help our customers to succeed by serving them throughout their lifespan.

##### **Teamwork**

We respect each other, promote open communication, and co-operation.

##### **Continuous Improvement**

We want to do better, value continuous learning, and dare to think differently.

##### **Sustainable Profitability**

We are committed to sustainable profitable growth and responsibility.

Mikko Keskinen

CEO Tamtron Group

## 1 PEOPLE

### **Respect for Human Rights**

In all our operations, people are always at the center. We value every individual regardless of their role. We respect internationally recognized human rights as per the Universal Declaration of Human Rights by the United Nations and the core principles and rights at work of the International Labour Organization (ILO). We do not tolerate the use of forced or child labor, any form of discrimination, or other human rights abuses in any of our operations.

We also expect our customers, suppliers, and other partners to treat our employees with respect and equality.

We draft procurement contracts in a manner that allows us to immediately terminate cooperation with a supplier if it is found that the supplier is engaged in misconduct.

### **Occupational Health and Safety**

The well-being, health, and safety of employees are of paramount importance to us. In all our operations, we comply with up-to-date occupational health and safety legislation. We provide our employees, subcontractors, and others working for us with a healthy and safe work environment. In addition to physical conditions, we actively support and care for the mental well-being of our staff.

All employees are committed to following our organization's occupational safety guidelines in all work-related activities. Safety is non-negotiable.

It is the responsibility of supervisors to ensure that their staff are properly trained in occupational safety matters and to ensure the adequacy and proper use of safety equipment.

We maintain a safety culture by communicating openly about issues and providing regular training. We intervene immediately in risky work situations. We report accidents, hazards, and safety observations immediately using agreed reporting channels. It is everyone's responsibility to maintain the safety culture. One should never assume that someone else has reported risks and issues. We are proactive in all safety-related matters.

### **Fair Employment Conditions**

Our work culture is based on current labor legislation and applicable collective agreements, which we adhere to. In addition, fairness and respectful treatment are fundamental principles of our work community.

We ensure that the basic rights of our employees are fulfilled. We support their right to organize, belong to a trade union, and negotiate collectively.

### **Prohibition of Discrimination and Equal Opportunities**

We do not tolerate any form of discrimination. The prohibition applies particularly to recruitment, promotions, training, remuneration, employment durations, and retirements.

We offer equal opportunities for all to develop in their work. Each employee is expected to be proactive and encouraged in continuous learning and professional development.

We promote an equal, open, and harassment-free work culture. We do not tolerate any form of sexual harassment or other harassment.

We value diverse cultures, different expertise, experiences, and backgrounds. Each of us can contribute to making our workplace diverse and inspiring. We treat different perspectives with respect and provide everyone with equal opportunities to participate.

We continuously work together to create a trust-based, good, and inspiring work environment characterized by safety, satisfaction, and participation.

Our starting point is that every individual is unique and of equal value, and based on this, we treat each other with respect and trust.

## **Sponsorship and Community**

Donations to charity and support shown through sponsorship from the company's funds require the discretion and decision-making of management. Sponsorship projects always involve written agreements and sponsorship plans approved by the group CEO.

We do not sponsor activities related to political activities, violence, religious organizations, alcohol, or drugs. The company never takes a stance on political issues, supports political parties, or financially supports political activities.

## **2 ENVIRONMENT**

### **Environmental Objectives**

We actively seek to reduce the harmful environmental impacts of our operations and products. We consider environmental aspects in all our activities - in product development, production, supplier relationships, and other business operations.

The equipment, facilities, and services provided by the company adhere to the principles of energy-efficient life cycles and optimal use of valuable raw materials. The techniques used are energy-efficient and conserve natural resources. Sustainable development goals guide our product development.

We comply with environmental laws and regulations related to our operations. An environmental responsible person is appointed within the organization.

In our daily operations, we strive to avoid waste of natural resources and use them efficiently. We handle chemicals and hazardous waste safely and according to guidelines. We ensure the safety of our products and compliance with legal requirements.

We continuously monitor the development of rules and regulations, adjust our routines and methods as conditions change, and continuously inform our customers about matters related to our joint projects.

## **3 BUSINESS CONDUCT**

### **Conflicts of Interest and Avoidance**

We do not engage in business that may lead to conflicts of interest.

We require loyalty from our staff and expect everyone to be committed to working towards common goals. Our employees act in the company's best interest in their roles. We avoid situations where an employee's personal interests conflict with the interests of the company. Such a situation may arise, for example, if an employee has ownership, decision-making power, or family members in our supplier, customer, or competitor companies, or any other connection to them. If an employee has personal interests related to these companies, they should not participate in decisions involving these companies.

### **Prohibition of Corruption and Money Laundering**

Bribery or corruption, once proven, is a serious crime, with both the giver and the recipient being considered guilty. We do not accept any form of bribery or corruption. Money laundering is prohibited in all its forms.

We do not pay bribes or illegal payments to promote business. We do not accept or give business gifts or entertainment expenses that exceed the usual hospitality between business partners.

None of the company's employees or partners shall directly or indirectly promise, offer, pay, demand, or accept bribes or kickbacks to promote business, maintain business relationships, or gain unfair advantage, whether it involves public authorities, customers, suppliers, or other business partners. In addition to money and financial benefits, valuable gifts or services that may influence the objectivity of business decisions or seek privileged treatment are considered bribes.

If the acceptance or giving of a gift or service involves the possibility of even a minor conflict of interest, the matter should always be clarified in advance with the company's management. This practice ensures that neither our customers, suppliers, nor we ourselves end up in a situation that could be interpreted as bribery or corruption.

## **Gifts and Hospitality**

Hospitality and showing gratitude should be reasonable. It is permissible to give and receive gifts or benefits that are minor in nature and are of a reasonable quantity and value.

The line between a gift and a bribe varies in different cultures, where in some countries small gifts are part of the culture, while in others they are not. Even if a gift may seem reasonable, we always consider how it would appear to an outsider. Gifts can be openly disclosed, bribes cannot. There are no obligations associated with a gift, whereas a bribe is assumed to have such.

## **Fair Competition**

Competition legislation protects and promotes fair competition in business. Any business activity that restricts or distorts competition is prohibited. We are committed to competing in the market fairly and conscientiously. We comply with applicable competition laws in our operations.

We do not discuss sensitive topics or exchange related information with our competitors in violation of competition laws. Such information includes, for example, pricing, costs, production volumes, discounts, market area divisions, etc. We do not participate in cartels or other illegally restrictive agreements.

When selecting a supplier, we ensure that the supplier complies with local laws, including those related to the environment, safety, and the use of child labor. For any third party acting as a middleman in trade, we only pay the agreed price or fee for their services.

## **Sanctions**

We comply with applicable trade sanctions as well as import and export customs regulations. All actions related to terrorism financing and money laundering are strictly prohibited.

We do not tolerate any circumvention of sanctions through third countries or intermediaries, and we also require resellers to ensure that the products supplied to them do not end up in sanctioned countries.

## **Confidential Information**

We take great care of our own and our business partners' tangible and intangible assets. We protect our company's intellectual property rights – patents, trademarks, inventions, copyrights, and trade secrets. We respect the inventions, trade secrets, and industrial and intellectual property rights of our business partners and other third parties, and we do not attempt to benefit from them illegally.

We handle confidential information carefully. We take special care of trade secrets such as sales opportunities, customer, technology, and financial information, and do not disclose them to third parties without a legitimate business reason. We ensure data security and protect ourselves from cyber risks using appropriate means. We require our staff and subcontractors to comply with the company's information security guidelines.

We ensure proper protection of personal data concerning our employees, customers, and other stakeholders. We handle all personal data in accordance with applicable privacy and data protection laws and regulations. We collect, use, or process this data only for specified lawful business purposes.

## 4 REPORTING VIOLATIONS

### **How do I report misconduct or concerns?**

Tamtron encourages its employees to raise their observations of misconduct or other concerns whenever there are grounds for it.

Misconduct should be addressed primarily with one's immediate supervisor. If this is not possible, then contact can be made with the supervisor's supervisor or the group management.

Tamtron's website has a link to the Whistleblow channel, where misconduct can be reported. Besides employees, external stakeholders also have access to it.

### **Process for Handling Misconducts and Concerns**

Tamtron's group management is informed of violations of the Code of Conduct. Reported cases are handled as quickly, confidentially, and impartially as possible.

All violations of these rules or separate guidelines or policies are investigated, and necessary actions are taken based on them. Depending on the severity of the violation, it may result in a warning, termination of employment, or civil and criminal proceedings. Violations may lead to the termination of cooperation with Tamtron Group's companies in the case of a subcontractor/supplier.

### **Commitment to Non-Retaliation**

We do not tolerate any retaliation, threats, or discrimination against individuals who honestly and sincerely report suspected violations.

If there are any questions about the content or interpretation of the guidelines, they should be addressed to the group CEO.