#### Code of Conduct: Principles of Good Business Practice at Suomen Vaimennin Ov

Version:

Prepared by: Harri Harju-Villamo

Date: 15.3.2019

## Principles of good business practice at Suomen Vaimennin Oy

It is important for us at Suomen Vaimennin Oy to grow and develop the company's business in a long-term and sustainable way. That is why we do our job responsibly, taking into account the expectations of our customers, staff and other stakeholders. This Code of Conduct applies to all of our business and defines how our personnel operate.

Our values are balanced growth, continuous development, constructive cooperation, respect, and trust. Our actions must also be in line with our values.

## 1. Compliance with Laws

We comply with applicable legislation. In addition, the international regulations and agreements that guide our operations are:

- UN Declaration of Human Rights
- The UN Global Compact, which promotes human rights, labor rights, environmental protection and the prevention of corruption
- ILO Declaration on Fundamental Principles and Rights at Work
- Recommendations of the ICC of the International Chamber of Commerce
- Responsible Minerals Initiative

Each of us must be aware of the laws, regulations and guidelines that apply to our own work and commit to complying with them. Supervisors are responsible for the necessary orientation and monitor compliance with laws, regulations and guidelines.

## 2. Financial responsibility

### Management

We follow the corporate governance principles and recommendations for Finnish limited liability companies. These principles and recommendations define the tasks and procedures of the administration.

#### **Promoting competition**

We comply with applicable competition laws in all of our operations. This applies to all our behaviour in relation to Suomen Vaimennin Oy's competitors, partners and customers. In case of doubt, we will contact your supervisor or lawyer.

#### **Conflicts of interest**

We work for the benefit of Suomen Vaimennin Oy, which is why our personal interests must not conflict with the interests of Suomen Vaimennin Oy.

We do not pay or accept bribes or other illegal payments to start or promote a business.

We do not work or participate directly or indirectly in competing business operations or in the business operations of a party in Suomen Vaimennin Oy's business relationship, and we do not seek personal financial gain in business relationships.

We do not offer or accept hospitality or gifts or benefits that can reasonably be expected to influence decision-making in our business dealings or that go beyond normal hospitality.

### A customer relationship

Satisfied customers and long-term customer relationships are the foundation of our future success. Our goal is to be the first choice for existing and new customers. That's why we make sure our own actions live up to the promises we make to our customers.

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#### Relationships with subcontractors, suppliers and other partners

In our work, we need a wide range of subcontractors, suppliers and other partners. Open interaction, adherence to agreements and gaining mutual trust are important for the success of both us and our partners.

We choose our partners on the basis of objective criteria, and personal choices must not influence our choices. Our partner's quality, reliability, price, delivery capacity and operating methods must comply with the requirements of Suomen Vaimennin Oy.

We require our partners to comply with laws and regulations, as well as international human rights, labor rights and environmental regulations.

#### Relations with public authorities and policy makers

Our communications with decision-makers, authorities and political parties and actors shall be transparent and shall not compromise the independence of the parties or be liable to give rise to conflicts of interest or suspicions.

### Property and confidential information of Suomen Vaimennin Oy

We take good care of Suomen Vaimennin Oy's property and do not use it for unauthorized purposes. We protect confidential material and information that subcontractors, suppliers, customers and other partners have entrusted to us, at least in the same way as Suomen Vaimennin Oy's own confidential material.

## 3. Social responsibility

We want to provide each other with a good, safe and inspiring work environment. Suomen Vaimennin Oy's supervisors are required to actively promote the company's values and culture in accordance with these guidelines. Our staff is encouraged to participate interactively in the development of the work community.

We pay attention to our values, in particular in personal development, wellbeing, endurance, health and safety at work, as well as work and leisure-time coordination.

We respect our employees freedom of association and participation in collective bargaining. We do not accept the use of forced or child labor or treatment or working conditions that are in conflict with fundamental international rights at work.

We treat people who work in our company and apply for our services equally in our policies, principles and procedures related to employment and recruitment. In all our employment policies, we are committed to equal treatment of our employees. We do not accept discrimination based on race, national or ethnic origin, nationality, color, language, sex, age, family relationships, sexual orientation, health status, religion, social opinion, political or professional activity, or any other equivalent. We do not condone any kind of harassment or bullying in the workplace.

# 4. Environmental responsibility

Suomen Vaimennin Oy wants to act as an environmentally responsible industrial company.

For our part, we are responsible for our environment. Working in industry, we have a special responsibility and opportunity to constantly strive to reduce our environmental impact and promote sustainable development in our production. We take environmental considerations into account in all our operations.

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We conduct our environmental work in accordance with our environmental policy and continuously develop our environmental systems, practices and indicators. Our goal in environmental matters is continuous improvement. Our staff receives consistent training and guidance on environmental issues.

### 5. Communication and stakeholder relations

In our internal and external communications, we provide our stakeholders with the right information about Suomen Vaimennin Oy's goals and operations. The general principles of our communication are reliability, transparency and speed. We provide information in accordance with laws and official regulations.

Donations, sponsorship and other stakeholder engagement must be in line with our principles of good business practice and support the achievement of our goals.

### 6. Alcohol and drugs

Since we are working in an industry where our company's products may impact strict safety requirements, we are all committed to work in a substance-free work environment. Our goal is to ensure alertness and good attention in ever-changing situations. We are all dependent on each other's performance in our work and we must also be able to trust each other's performance. We also understand, ensuring the safety of products, how important employers are to the products we manufacture. The use of intoxicants and the appearance of intoxication or hangover are not permitted in the workplace or during working hours. The introduction of intoxicants and their devices into the workplace is not permitted. Also, speech and behaviour that encourages or facilitates substance use are not favoured in the workplace or during work hours.