

## **CNCENTER OY – CODE OF CONDUCT**

### **Code of Conduct**

CNCenter Oy is committed to conducting its business in a sustainable manner. We strive to adhere to the highest legal and ethical standards in all our business practices. Each of our employees is expected to act responsibly and honestly and to follow this Code of Conduct and the policies and guidelines underpinning it.

We always comply with the laws and regulations of each country in which we operate, and we expect the same from our suppliers, subcontractors, and business partners.

### **Respect for human rights and employees' rights**

We support and respect universal human rights as defined in the UN's Universal Declaration of Human Rights. We do not engage in activities that directly or indirectly violate human rights. We support the labour rights defined by the International Labour Organization (ILO), and respect our employees' right to join and form unions, and their right to bargain collectively. We do not tolerate any form of forced or compulsory labour or the use of child labour. We do not accept any kind of discrimination, bullying or harassment based on race, ethnicity, nationality, gender, sexual orientation, marital status, religion, origin, disability, age, or any other basis.

### **Child labour**

We do not employ children under the minimum working age in any of our operations. We do not hire children over the minimum working age to perform work that may be hazardous or harmful to the child's development.

### **Employment contract, employment terms, and compensation**

We make sure that our employees' employment contracts, working conditions, salaries, and benefits comply with national legislation. We also expect our partners to adhere to the same principles.

### **Occupational safety and health**

We strive to prevent occupational accidents and health risks in advance. We promote wellbeing at work by using proper and safe work methods. Consistent compliance with these principles is in all our interests. We support our employees' wellbeing at work by striving to consider their work-life balance and identifying the mental and physical stress factors of their work as early as possible. Each employee is responsible for following the safety instructions and using appropriate personal protective equipment.

## **Environment**

We are committed to manufacturing our products in an environmentally friendly way by anticipating, reducing, and preventing the environmental impacts of our operations, products, and services. We promote sustainable development by applying the latest technological developments to manage our raw materials, processes, products, waste, and emissions. Every employee must follow environmental protection guidelines and procedures.

## **Responsible procurement of minerals**

We comply with the laws and regulations applicable to minerals from conflict areas. Minerals from conflict areas are minerals originating from conflict-affected and high-risk areas where the trade of minerals may, directly or indirectly, finance or benefit armed groups that can reasonably be assumed to contribute to serious human rights abuses. Any goods delivered to Heikki Laiho Oy must comply with the applicable laws and regulations regarding minerals from conflict areas.

## **Preventing corruption and bribery**

All forms of bribery are strictly prohibited. We do not offer or accept bribes. This rule applies to all counterparties, including the public sector, authorities, service providers, and suppliers. In addition to monetary bribes, receiving or accepting any gift of value is also considered bribery. These principles may not be circumvented through third parties.

## **Data security**

We acknowledge that we hold information about our employees, suppliers, customers, or other stakeholders that may be confidential or sensitive in nature. We keep this information only for as long as is reasonably necessary for the purpose for which it was collected. We take appropriate security measures to prevent the misuse of and unauthorised access to the data.

## **Monitoring, implementation, and development of these rules**

Compliance with this Code of Conduct is strictly monitored by the managers and supervisors. We encourage employees and other stakeholders to report any suspected misconduct or violations of these rules.