

# **CODE OF CONDUCT**

#### Introduction

Temet Group Oy and its affiliates ("Temet") Code of Conduct forms the basis and minimum standards of our actions and defines together with our strategy and values how Temet employees conduct our business. Our mission is to save and protect lives and valuable assets by providing and protective solutions against the impact of crisis or industrial accidents and by building safe infrastructures. We aim to grow and conduct our business in a responsible manner. Our commitment extends beyond our own work environment, to the global communities in which we live, work and serve. We understand that our operations are carried out in the middle of different cultures and environments.

As employees of Temet, we are committed to build up a strong business culture and a motivating working environment that relies on safety, trust, respect, integrity, and courage to change. We have an obligation to all our stakeholders to observe high standards of integrity and fair dealing.

What does this mean for our employees? Our company's reputation is reliant on the conduct of its employees. During their work, each employee is expected to comply with the requirements set forth in this Code of Conduct without exception.

Code of Conduct is supplemented with company policies:

- Occupational Health and Safety Policy
- Quality and Environment Policy
- Information Security Policy
- Data Security Policy
- Corporate Social Responsibility (CSR) Policy

# Wellbeing of employees

# 1. Health and Safety

We are committed to the health, safety and security of our people and others directly impacted by our activities. To achieve this, Temet and its employees, suppliers and business partners shall:

- 1.1 respect occupational well-being and commit to becoming one of the safest companies in our field of business and not make a profit at the expense of safety or security;
- **1.2** ensure that appropriate health and safety information and equipment are provided to our employees;
- 1.3 demand that contractors working at our facilities comply with the health and safety requirements set by Temet;

**1.4** provide employees and contractors with drinking water, appropriate sanitation, adequate ventilation, emergency exits, proper housing and working environment and access to first aid supplies or other provision for emergency care.

# Respectful workplace

#### 2. Human and labour rights

We respect human rights and ensure a fair working environment.

We commit to respect human rights under the International Bill of Human Rights, UN Guiding Principles on Business and Human Rights and the OECD Guidelines for multinational Enterprises as well as International Labour Organization Declaration on fundamental Principles and Rights at work (ILO Core labour standards). Employees are entitled to fair treatment and equal opportunities, and they are committed to respect the human rights and dignity of all employees and other stakeholders. We do not tolerate any form of discrimination, harassment, or substance abuse, and we are committed to respecting our coworkers, employees and business partners' privacy and the confidentiality of personal data. We are aware of the potential impact on human rights and acts according to relevant international or local law. If no official guidelines are available, Temet will seek other sources as to choose the best approach under the specific circumstances.

We shall:

- **2.1** adhere to applicable laws regarding working hours, minimum wages, overtime, sufficient breaks and rest time, sick leave and annual holidays, as well as parental leave and mandatory benefits (e.g. social security), and have appropriate records of these in place;
- **2.2** not employ minors and any employees younger than 18 years of age in positions that requires hazardous work, and establish systems to ensure fulfilment of and follow-up on these requirements;
- **2.3** not use any compulsory or forced labour, and ensure that recruitment fees and associated costs are not borne by employees and not confiscate their personal identification documents;
- **2.4** not tolerate any type of harassment of its employees or co-workers whether direct or indirect, physical or verbal;
- **2.5** provide equal opportunity and treatment in employment, without regard to race, colour, religion, gender, political opinion, national extraction, social origin or any other similar distinction which is not based on the inherent requirements of the work;

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- **2.6** recognise and respect employees' right to organize freely and bargain collectively with their freely chosen representatives;
- **2.7** ensure that the employees understand their rights and what they are committing to in the employment relationship;
- **2.8** respect employees' right to privacy and process personal data in compliance with applicable legislation;
- **2.9** engage our business partners and suppliers to comply with our ethical conduct.

# **Being ethical**

#### 3. Business Conduct

We operate with integrity with our customers, suppliers, and other business partners and avoid situations where private interests might conflict with business interests. We have zero tolerance towards bribery and corruption in our organization across all of our business units.

To achieve this, we shall:

- **3.1** conduct ethical business, adhere to agreed contractual obligations and notify business partners of exceptional circumstances in a reasonable time;
- **3.2** select and treat our business partners professionally, fairly, and equally based on objective factors and excluding personal preference or interest.
- **3.3** expect that our employees act in the company's best interest. Employees must avoid situations where their personal interest conflicts, or appears to conflict, in any way with Temet's interest.
- **3.4** have procedures in place to ensure that our directors, employees and third parties acting on our behalf do not offer, promise, give or accept any bribes, or make or accept improper payments to obtain new business, retain existing business, or secure any other improper advantages.
- **3.5** compete in a fair manner in compliance with all applicable antitrust laws and regulations and shall have procedures in place to ensure that our directors and employees do not engage in any anti-competitive practices;
- **3.6** comply with all applicable legislation concerning the prohibition of money laundering or financing for illegal or illegitimate purposes;
- **3.7** conduct business in accordance with applicable trade compliance laws and regulations;
- **3.8** respect all confidential information and intellectual property rights of our business partners and third parties; and

**3.9** be aware of risks related to business continuity and shall have a mitigation plan for all key business continuity risks. Further, Temet shall also take into consideration preparing for and managing of global risks such as pandemics, extreme weather or natural disasters, and terrorism.

#### 4. Product safety and quality

Temet shall follow applicable laws and regulations on product safety and quality and ensure that the products are developed and produced to the highest ethical and safety standards.

#### 5. Compliance with laws and regulations

We act in compliance with laws and regulations in the countries in which we operate, and we expect our business partners to comply with all legal requirements as well. Temet is a good corporate citizen. We operate in compliance with all applicable, national, and international, laws and regulations, international conventions, and generally accepted practices for good corporate governance.

However, we see these only as the minimum standards for us, and our way of conducting business goes much further than this baseline, as set out in this Code of Conduct. We only do business with such suppliers, customers, and other business partners that we expect to comply with all applicable laws and regulations. Temet Supplier Code of Conduct defines the basic requirements Temet expects its suppliers to adhere to and implement throughout their business.

# 6. Economical responsibility

We provide our shareholders with good total shareholder return over the cycle. To achieve this, we shall:

- **6.1** commit to grow our shareholder value by leveraging our extensive expertise in developing, producing, and selling premium-quality products and services. Our assets in the form of financial, physical, or intellectual property must be secured and protected to maintain their value.
- **6.2** maintain and manage accurate and complete data, records, reporting and accounting of our assets, liabilities, and other essential information on all our businesses (whether financial or non-financial) in accordance with good business practices and generally accepted accounting principles

## World and environment around us

## 7. Environment

We aim to protect the natural environment where we operate.

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- **7.1** aim that our operations do not cause harmful impact on the natural environment and the surrounding community.
- **7.2** aim to minimize the environmental impact of the energy used in logistics, heating, and any other application for which are used to make or transport our products by monitoring our operations.
- **7.3** take sustainability into account when developing our products and processes;
- **7.4** commit to learn more about the impact of our products over their entire life cycle and using this information to further enhance their performance.
- **7.5** continually look for ways to minimise waste emissions and discharge of our operations, products and services

# How we communicate as a company?

#### 8. Communication

We communicate openly with our stakeholders and are not involved in political or religious activities, nor do we make contributions to these types of activities as a company. We aim to communicate punctually, accurately, and consistently, and provide a sufficient level of information to ensure that all stakeholders and other business partners can form a true and fair view of Temet and its current and future operations simultaneously and equally. We value open discussion and maintain continuous dialogue with the societies where we operate, including governmental and non-governmental organizations and the media.

#### How is the Code of Conduct executed?

## 9. Implementation

Values are discussed and reflected in personnel training, team meetings and individual discussions as well as integrated into processes and communications. For employees our internal documents are available in our management system.

# 10. Reporting of non-compliance, nonretaliation

Temet employees and other stakeholders shall report any observed or suspected activities which are in violation of this Code of Compliance, the law or other company policies ("non-compliance") to Temet's Management.

To promote a secure operating environment that aligns with our commitment to stakeholders, we have implemented a reporting channel for suspected misconduct. Temet encourages stakeholders and employees to promptly report any observed or suspected activities that contravene Temet's Code of Conduct.

The whistleblowing system provides a channel to bring suspected misconduct or a violation of operating principles to the investigation. Notifications are handled confidentially, ensuring the protections of the privacy of both the notifier and the subject under scrutiny.

Acting in good faith, those reporting concerns will face no retaliations against themselves, their relatives, employers, or those who assisted in making the report. Our reporting channel operates in accordance with the Whistleblower Protection Act and the Whistleblower Protection Directive of the European Union, adhering to data protection obligations outlined in the Data Protection Act (1050/2018).

Notifications received in the channel are processed by the three-person team of Temet's notification channel, which initiates the necessary investigations. If the notification concerns one of the processors, he/she will not participate in the handling and investigation of the case.

The results of the investigations of the notifications received are regularly reported to the Temet Group's Board of Directors.

You can register your notification here: www.firstwhistle.fi/temet

Temet Code of Conduct is based on our values and the following international principles and standards

- International Bill of Human Rights
- UN Guiding Principles on Business and Human Rights
- ILO Core labour standards
- OECD Guidelines for Multinational Enterprises
- EN ISO 14001:2015 Environmental Management systems. Requirements with guidance for use.
- EN ISO 9001:2015 Quality Management systems. Requirements.

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