Elcoline Group Management Board

Elcoline Group Code of Conduct

Guiding Ethical and Sustainable Business Across All Partnerships

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1 Purpose and Scope

At Elcoline Group, we are committed to conducting our business with integrity, professionalism, and respect for people and the environment. This Code of Conduct outlines our expectations for employees, suppliers, subcontractors, and customers. It serves as a foundation for responsible business practices that support safety, quality, legal compliance, and long-term sustainability.

2 Our Principles

Our core principles shape the way we operate and collaborate:

- ✓ ***Safety*** *– Protecting people and the environment is our top priority.*
- ✓ ***Reliability*** *– We keep our promises and deliver consistently.*
- ✓ ***Accuracy*** *– We work with precision and high standards.*
- ✓ ***Flexibility*** *– We adapt to customer needs with agility.*
- ✓ ***Efficiency*** *– We optimize resources to deliver value.*

3 Legal and Regulatory Compliance

We expect all parties to:

- Comply with all applicable laws, regulations, industry standards and fair competition.
- Avoid any practices related to corruption, bribery, or antitrust violations.
- Report concerns of legal non-compliance through appropriate channels.

4 Health, Safety, and Security

A safe and secure work environment is fundamental. All must:

- Follow Elcoline's health and safety procedures and local safety legislation.
- Identify and report unsafe conditions or incidents immediately.
- Promote a culture where safety is everyone's responsibility.

5 Environmental Responsibility

We are committed to minimizing our environmental impact. We expect:

- Efficient use of energy and natural resources.
- Pollution prevention efforts, especially related to air emissions.
- Compliance with applicable environmental laws and Elcoline's environmental procedures.

6 Quality and Service Standards

We take pride in delivering technical services that meet the highest quality standards. All parties are expected to:

- Strive for continuous improvement and excellence in delivery.
- Follow agreed specifications, standards, and customer requirements.
- Cooperate to solve issues openly and constructively.

7 Human Rights and Fair Working Conditions

Respect for people is non-negotiable. We require:

- No tolerance for child labor, forced labor, or any form of discrimination.
- Fair wages, reasonable working hours, and safe working conditions.
- Respect for the rights of workers to associate freely and voice concerns.

8 Diversity, Equity, and Inclusion

Elcoline believes in building a respectful and inclusive workplace and partnership network. We value:

- Equal opportunities for all regardless of background, gender, age, ethnicity, religion, or other status.
- A workplace culture where everyone is treated with dignity and fairness.
- Collaboration that leverages different perspectives and talents.

9 Ethical Business Conduct

We uphold high ethical standards and expect others to do the same:

- Avoid conflicts of interest in all decision-making.
- Do not offer or accept inappropriate gifts or hospitality.
- Protect confidential information and data privacy at all times.
- We communicate honestly and clearly in all business and marketing communications.

10 Financial Integrity and Responsibility

We expect everyone working with or on behalf of Elcoline to demonstrate financial integrity in all transactions and processes. This includes:

- Maintain truthful, timely, and complete financial and operational records.

- Never engage in or tolerate fraud, theft, or any form of dishonest financial conduct.
- Be alert to suspicious transactions, money laundering, and comply with relevant laws and practices.

11 Procurement and Supply Chain Expectations

Our suppliers and subcontractors are critical to our success. We expect:

- Ethical sourcing of materials and transparent business conduct.
- Compliance with this Code and any applicable contractual requirements.
- Support for sustainable practices across the value chain.

12 Reporting and Whistleblowing

We encourage openness and accountability:

- Concerns or suspected violations of this Code should be reported to Elcoline's designated contact or via our Whistleblower system.
- Retaliation against individuals reporting concerns in good faith is strictly prohibited.

13 Implementation and Commitment

This Code of Conduct is shared with all employees, suppliers, subcontractors, and customers. It forms part of onboarding and key project or procurement documentation. We ask everyone to:

- Read and understand the Code.
- Commit to upholding the principles outlined.
- Support a responsible and sustainable business environment.

14 Review and Updates

This Code of Conduct is reviewed regularly to ensure it reflects current laws, standards, and our company values. Elcoline reserves the right to update or amend this Code, and all relevant parties will be informed of significant changes.

15 Leadership Commitment

Elcoline Group is committed to upholding the values and principles outlined in this Code of Conduct. We expect everyone working with or on behalf of Elcoline to do the same — ensuring that integrity, safety, and sustainability guide our work every day.

Signed on behalf of Elcoline Group,

Jere Räisänen

CEO

Elcoline Group Oy

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