

CODE OF CONDUCT



OUR VALUES



TRUST & OPENNESS

Sharing information openly within our company units and with our co-operators is the key to better understanding as well as success.



CUSTOMER FOCUS

We want to consistently exceed customer expectations.



CONTINUOUS IMPROVEMENT

We aim to develop ourselves every day, at every level of the organization.



SUSTAINABILITY

We treat everyone equally and keep the environment safe for all. Reducing waste and managing resources sustainably is in our nature.



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Dear Promeco Colleague & Partner,

We have collected key rules and guidelines in the Code of Conduct to ensure everyone acts with honesty and integrity in Promeco. The Code defines ethics, morals, and responsibilities and gives guidelines for working as individuals, teams, or as a company. We are forerunners in our business segment in sustainability, which is one of the key values guiding our operations.

The purpose of the Code is to keep our business safe and fair for everyone by informing our employees and external stakeholders of Promeco's requirements and expectations towards them. For further guidance, you should always turn to your supervisor or contact at Promeco. Together we ensure proper execution through the organisation every day and by everyone without any exceptions.

We ensure that all our operations and actions comply with laws and regulations and are performed in a socially responsible manner. Please familiarise yourself with this Code of Conduct. And those of us working with external stakeholders, help us communicate it with our business partners, suppliers, and customers.



A handwritten signature in black ink, appearing to read 'Ville Ritakorpi'.

Ville Ritakorpi
CEO
Promeco Group Oy



CODE OF CONDUCT

Our Code of Conduct describes how we operate at Promeco. It details the ethical principles guiding our ways of working and reflects our core corporate values. Everyone working at Promeco is expected to act responsibly and honestly and follow these shared principles and guidelines.

The Code of Conduct describes our operating principles at Promeco

This document serves as a practical rule book that guides everyday operations at all levels of the organization describing what is expected from our internal and external stakeholders. When everyone has a clear understanding of what kind of behavior is desirable and what is harmful, it creates unity in our everyday actions. When everyone knows how to play fair, it supports the well-being of the working community and the well-being of our operating environment as a whole. Promeco Code of Conduct is part of every employee's orientation and familiarisation process.

Promeco is part of the UN Global Compact. The Compact aims to promote human rights and their compliance, the improvement of the workers rights, environmental issues, and anti-bribery.



COMPLIANCE OF LAWS AND RULES

At Promeco, we comply with applicable laws and regulations wherever we operate. We comply with all applicable export controls and economic sanctions. We follow the instructions of Promeco and our partners and ask for guidance in case of uncertainty.

We also expect our suppliers, agents, consultants, and other business partners to fully comply with all applicable laws and regulations, and conducting all business in compliance with the Code. Any statement or lack of specification in this Code, however, should not be understood as an instruction to break any law or regulations.

Compliance is essential to build trust in our products and services leading to success for us and our customers.

[Learn More: 10 principles of the United Nations Global Compact](#)



Keep these principles in mind

Each employee has a personal obligation to get to know the laws, regulations, and requirements that relate to or affect their work.



PERSONNEL HEALTH AND SAFETY

It is our responsibility to provide a safe and healthy working environment for all employees. We are committed to making work wellbeing a priority. We are confident that occupational accidents, incidents, injuries, near misses, and work-related illnesses can be prevented by taking all necessary actions. We actively carry out risk assessments to ensure work safety and well-being.

Our personnel has the responsibility to report unacceptable health or safety conditions, take preventive measures and minimize possible damages. Thus each employee contributes to work safety and well-being with their actions.

Our Occupational Health and Safety management system is certified according to ISO 45001.



Safety observations and near-misses are recorded electronically via intranet for processing. The tool used for reporting safety observations is called ProSafer. The form can be accessed from the front page of the intranet.



Keep these principles in mind

- Remember that your actions affect the safety of the entire company
- Pause and think for a moment before you start working, identify the risks
- Make sure you know and follow safety instructions and receive relevant safety training
- Always use the necessary protective equipment and the right tools
- Remember that our working environment is alcohol and narcotic substance-free
- Stop working when noticing a possible risk in continuing
- Safety observations and near-misses have to be reported and recorded
- Take care of your health and well-being



RESPECTING PEOPLE

Human and labour rights

Compliance with human rights and labour rights is at the core of Promeco's day-to-day operations. We require all our employees and external stakeholders to act by these principles. We maintain a working environment in which no discrimination, harassment, favoritism, or other unfair treatment based on gender, ethnicity, religion, nationality, sexual orientation, age, or other personal characteristics is tolerated. We respect the integrity and privacy of every employee and their rights, for example, decide on joining trade unions. No child labour is allowed, and with young workers, legislation is carefully followed. No forced labour is allowed, including forms of modern slavery or human trafficking.

In our operations, we respect human rights as defined in the UN Universal Declaration of Human Rights and the fundamental labour rights defined by the International Labour Organization (ILO). We comply with the national laws and regulations that are statutory to the employer.

Diversity and occupational health are cornerstone of our success. By selecting the right people for the positions based on their competence and professional skills, we not only follow a fair way of working but also guarantee the best conditions for sustainable business. Through practical measures, we want to take into account and support the diversity of the work community and promote the well-being of the work community both at work and in free time.

Learn More: [UN Universal Declaration of Human Rights](#)

Raising issues and bringing them up early on is the most effective way to stop inappropriate behaviour.



- You have the right to be treated fairly and express yourself in an appropriate manner
- You must treat others fairly and respect their right to appropriate self-expression
- No abuse, bullying, or harassment is allowed, whether verbal, physical, or visual
- You can find more information about your rights on the intranet (e.g. insurance policy, wellbeing benefits)
- You have a right to choose whether to join trade unions or not
- Remember that diversity is a strength for us



DATA PRIVACY & CYBER SECURITY

We are committed to the highest standards of data privacy and cybersecurity. Modern and reliable security products and technologies are utilized to identify and remove cybersecurity threats, ensuring that data is defended against unauthorized access and potential breaches. Updates and maintenance of these security tools are carried out regularly to adapt to the evolving cybersecurity landscape.

Promeco believes in empowering its employees through regular training and awareness programs on data privacy and cybersecurity. This approach ensures that the team is well-equipped with the knowledge and expertise to manage and protect data effectively, aligning with Promeco's data protection principles.

Personal data is treated respectfully, ensuring that all processing activities adhere strictly to GDPR and best practices. All personnel must maintain the confidentiality of personal data, ensuring it is only shared when essential and under secure conditions. Information sharing is conducted with discretion, ensuring that data is disseminated only when necessary and always securely and confidentially. Guidelines and procedures are in place to manage and monitor the secure sharing of information.

Our cybersecurity processes, such as Incident Management and Disaster Recovery are systematically reviewed, trained, and tested. We maintain thorough cybersecurity standards, constantly seeking ways to strengthen the company's defenses against cyber threats. Employing the industry's best practices is fundamental to achieving and maintaining a robust cybersecurity posture.

Promeco will ensure that it remains up-to-date with current data protection and cybersecurity laws and regulations, committing to full compliance with these legal requirements.



- Only use personal data for the purpose it was collected for
- Be aware of various phishing attempts
- Take personal responsibility to understand how to use devices and information securely
- Be vigilant, act, and report any suspicious activity when you are online or on the phone



FAIR BUSINESS COMPETITION

We support fair business practices. We treat all our partners fairly and equally. We expect all of our business partners to observe and follow these ethical principles. If needed, we will instruct our business partners regarding compliance with fair business practices and preventive measures.

We are committed to complying with competition law. When cooperating with our competitors, we ensure that the cooperation does not include anti-competitive practices such as restricting or seeking to restrict competition. We are striving for fair competition and a free market, thus we refuse to agree or discuss with competitors on pricing, market shares, or other similar matters. We do not participate in business relationships that may lead to conflicts of interest. This applies to all situations that may regard an employee's personal and/or business-related interests.

We do not accept bribery and corruption in any form. We must not give or receive any benefits or advantages, which can be considered as bribery or corruption.

We do not participate in or support business practices aiming to launder money, directly or indirectly, nor do we take part in activities with a risk of fraud.

** Bribe:*

- *Receiving money*
- *Receiving a gift: Own discretion to be used if the gift's value is less than 50 €*
- *If the value is more than 50 € will be agreed with the supervisor, however, a maximum of 200 €*
- *Giving a gift: comply with the recipient's rules*



- Always clearly and openly distance yourself from any decision-making if close personal connection is involved
- Remember that open discussion is the best way to avoid conflicts of interest
- Gifts and hospitality must never affect or appear to affect decision-making
- Do not exchange commercially sensitive information with a competitor



REDUCE OUR ENVIRONMENTAL IMPACT

The environment is a key stakeholder for us, hence sustainability is a crucial aspect of our business.

We take responsibility for sustainable development and are committed to taking concrete actions to reduce our environmental impact. Our goals include e.g. reducing emissions and waste, reducing the use of hazardous substances, and using water and energy resources as sparingly as possible to combat climate change.

We comply with environmental legislation and international and national environmental agreements and standards in the areas affecting our operations. Our goal is to exceed the minimum requirements. In addition, we expect our suppliers and other partners to comply with relevant environmental legislation and applicable environmental agreements. We encourage our partners to contribute to sustainable development in their operating areas.

Our environmental management system is certified according to ISO 14001.



- Report any environmental risk observations
- Pay attention to and report any activities by our business partners that violate environmental care
- Minimize resource use, emissions, and waste



HOW DO I RAISE CONCERNS?

What should I report?

All employees are required to report any suspected or observed violations of the law, of this Code of Conduct, or other company policies – or if they are asked to do something that might be a violation. Sometimes we can find ourselves in challenging situations where it is unclear what is the right course of action. When in doubt, never hesitate to ask for guidance. Our operating culture is based on openness and trust.

No retaliation

The person making such a report does not have to fear retaliation or any other negative consequences. We duly investigate failure to comply with the principles and take appropriate actions when necessary.

CEO and Chairman of the Board handle feedback confidentially, and the informant does not have to fear retaliation or other possible negative consequences.

How to raise concerns?

You can report suspicions or violations that violate Promeco's Code of Conduct to your supervisor, CEO, occupational safety representative, HR department, or occupational health care or by using the electronic form on the front page of the intranet. Click on the ProCode icon (picture below) that opens the online form. Follow the instructions in the form and send feedback. The sender of the feedback cannot be identified. We encourage reporting with your name, however, anonymous notifications are also possible. If you are an external stakeholder you can report your complaints or concerns relating to violations against the Promeco Code of Conduct through our whistleblowing channel ProCode: https://whistler.fi/promeco/index_en.php



HOW DO I KNOW WHEN TO SEEK GUIDANCE?

If something does not feel right, then it might not be the right thing to do. Ask yourself:

- Am I sure this course of action is legal?
- Is it consistent with our values, Code of Conduct, Policies, and other internal instructions? Could it be considered unethical or dishonest?
- Could it damage Promeco's reputation?
- Could it harm people or the environment?
- Would I be embarrassed to read about it in the media?

