

CODE OF CONDUCT / COMPLIANCE

1. Code of Conduct / Compliance

The purpose of this guideline is to ensure that Dometal Oy and its subsidiaries, suppliers, subcontractors, partners, and stakeholders comply with internationally recognized regulations regarding human rights, labor, and the environment. We regularly review ethical rules and guidelines with our staff to ensure that these principles are implemented in our daily work. These actions strengthen trust and commitment, making us a reliable employer, partner, supplier, and customer. We also openly discuss ethical rules with partners and stakeholders.

The core values of Dometal Oy's ethical rules are based on the following values:

- Honesty
- Respect
- Fairness
- Reliability
- Excellent professional competence

2. Compliance with Laws and Regulations

We comply with all laws, regulations, ethical principles, and values in all our activities. We do not accept violations of laws, nor do we encourage or instruct anyone to violate them or do anything that we ourselves cannot do according to laws, regulations, principles, values, or policies.

3. Customers and Stakeholders

We are committed to acting reliably, respectfully, and honestly with excellent professionalism. We do not tolerate illegal or unethical behavior. Customer first is one of our values and the cornerstone of our strategy. We monitor customer satisfaction and take action to improve it when necessary.

We consider the target audience to share meaningful and relevant information. We actively engage with our stakeholders and listen to their views to improve our operations. We aim to build trust. We treat and serve all customers equally and without discrimination.

4. Personnel

Employee well-being is also one of our strategic values, and we monitor employee satisfaction. We invest in employee well-being through various measures, such as employee orientation and training, safe working practices and occupational safety, statutory occupational health care and insurance, fact-based timely and consistent communication, and an open company culture.

Our employees recognize the responsibility of their work. We are responsible for our work performance and decisions and ensure that we work efficiently and honestly. Creating and maintaining a good working atmosphere is our shared task. A functional and fair work community, where everyone enjoys working, is built on mutual trust, respect for individuals, genuine care, willingness to help, and an open team spirit.

5. Data Security

We handle all information responsibly and carefully. Customer data, personal data, and other confidential information are subject to absolute confidentiality. This information can only be collected for lawful purposes and as permitted by law. We follow good personal data processing practices and data protection policies. Additionally, we have defined that all company material is confidential unless it has been specifically published, such as website material and brochures.

We collect only the necessary information for the purpose of use in the personal register and have prepared a data protection notice. We have defined personnel processes and individuals who handle personal data, and others do not have access to personal data. Personal data handlers must not disclose the personal data they receive to others without a legal basis. Authorities may have a legal right to access information.

We use information systems and programs according to agreements and usage rights. We always ensure that confidential or important information is not lost or accessed by outsiders. We handle electronic devices carefully. When leaving workstations, we do not leave recordings and materials containing confidential information on desks. We regularly train staff on data security issues.

6. Human Rights

We are committed to respecting internationally recognized human rights in all our activities and promoting their realization. We do not accept human rights violations in any form. We do not accept the use of child labor, any form of forced labor, or other human rights violations in our supply chain.

7. Forced Labor and Child Labor

We do not practice or accept child labor, forced labor, or slavery. We take action to prevent and correct such impacts if they come to our attention.

8. Non-Discrimination

We respect the value and privacy of individuals and do not accept discrimination in any form. We do not discriminate against anyone based on age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, health status, disability, sexual orientation, or other personal characteristics. We do not accept harassment, threats, or insults. We respect freedom of association and actively ensure safe working conditions. Discrimination is not allowed in any company activities. We recognize that we are all responsible for creating a pleasant and inclusive workplace.

9. Freedom of Assembly

We respect employees' rights to freedom of association or assembly in accordance with local laws.

10. Equality and Fairness

We are committed to providing equal opportunities for all. We treat employees equally and fairly and comply with applicable labor laws. We are committed to the equal and fair treatment of employees.

Managers are responsible for promoting direct, open, and constructive discussions on all work matters and encouraging subordinates to ask questions, make improvement suggestions, and report any issues. Managers also ensure the professional orientation of employees and address practices that require correction. Managers must set an example of responsible behavior and must not require team members to act against laws, regulations, guidelines, etc. Human resources conduct a general orientation for all new employees, covering administrative matters and guidelines for various situations, ensuring common practices.

11. Occupational Health and Safety

We consider employee health and safety through statutory occupational health care, good occupational health cooperation and workplace visits, a regularly meeting and functioning occupational safety committee. Work accidents and near-miss incidents are addressed in the

occupational safety committee. Safety data sheets for exposures are listed and provided to occupational health care.

12. Product Safety

We ensure the safety of our products and their use. We ensure that our products are manufactured in accordance with relevant requirements and conduct quality inspections. Additionally, we perform final testing on all our products and the necessary number of in-process inspections and, if necessary, material acceptance inspections. We are ready to take immediate and appropriate action if our products do not meet internally defined requirements. We are committed to product safety at all stages, from design to manufacturing.

13. Statutory Insurance

We have statutory insurance in place.

14. Bribery

We are committed to honest and fair conduct and do not accept corruption or bribery in any form. Corruption means the misuse of power for personal gain or to achieve unethical or illegal benefits. It can manifest as bribery, excessive gifts, inappropriate donations, sponsorships, or conflicts of interest. We do not pay bribes or illegal payments to authorities or other parties to secure the company's business and its development. We commit to not advising, encouraging, enticing, or instructing anyone to take or give bribes through intermediaries or without intermediaries.

15. Hospitality and Gifts

In some cases, gifts and hospitality can be part of building relationships with customers, suppliers, and other business partners. We are committed to giving or receiving only minor personal gifts. The same applies to business-related hospitality. Acceptable hospitality or gifts are occasional and do not create open or hidden obligations or expectations of reciprocation for the giver or receiver. Acceptable gifts and hospitality are always given openly. We always follow the guidelines provided by organizations and authorities regarding the acceptance of gifts and hospitality.

There are also situations where hospitality or gifts are not acceptable, such as during contract negotiations with a supplier or service provider. We also do not participate in political activities or support political parties.

However, we can make reasonable donations for education, science, art, culture, social welfare, and support for children's and youth activities, provided that the necessary approvals have been obtained within our company. In this way, we aim to build a better society.

16. Conflicts of Interest

We always make decisions in the best interest of the company. Pursuing personal or close interests in the performance of work duties is not acceptable. We treat friends and relatives like other business partners, and personal relationships with partners do not affect our decision-making. In circumstances that may be perceived as a conflict of interest, we immediately inform the employer and together consider solutions (such as excluding the person from the situation and decision-making).

17. Fair Competition

We do not engage in activities that harm fair competition. We do not participate in anti-competitive activities by artificially setting high or low prices or dividing markets or customers with competitors. We do not exchange confidential information with competitors.

18. Environment

We strive to save the environment in our operations. We aim to minimize the negative environmental impacts that we may cause through our use of resources, activities, and products. We consider the impact of our products at all stages of their lifecycle, from design to manufacturing and use.

We strive to operate energy-efficiently. We aim to procure necessary materials and components locally to reduce transportation.

19. Multiva -Brand

We aim to build a good corporate image and promote the company's success through our activities. Integrity and openness are one of our strategic values. We communicate openly, directly, and honestly with customers. The Multiva brand is valuable to us, and we build our brand according to our values and strategy.

In marketing communications, we present the company, brand, product, service, price, and other factors clearly and truthfully, and do not use misleading expressions. We operate on social media according to the same principles as in other communications and interactions regarding the confidentiality and accuracy of information.

20. Trade Secrets

We keep confidential information about the company's operations, staff, customers, and partners obtained in our work and do not disclose or transfer this information to others except to those concerned.

21. Accounting and Internal Authorities

We are committed to the accuracy of our accounting and company information to ensure legal and ethical business practices. We comply with statutory requirements, internal practices, and guidelines. All transactions must be properly allocated and recorded in our accounting accurately, honestly, and timely. We have defined internal operating principles and established authorization management to ensure proper conduct.

22. Whistleblower Reporting Channel

We have a Whistleblower reporting channel in place. The reporting channel ensures confidential reporting of misconduct and other unethical behavior.