



MTC Flextek Oy Ab

Code of Conduct

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We are committed to doing the right thing

Doing the right thing is at the heart of all business. We operate in line with good business practice, with integrity and respect for others. We expect the same from our partners.

We always comply with laws, regulations, our Code of Conduct based on our values, and our company's operating guidelines.

The Code of Conduct sets out the principles for doing the right thing – how we operate in an ethically sustainable way. The Code of Conduct binds all MTC Flextek personnel, managers, Board members and others acting on the company's behalf.

In order for us to do the right thing, we must not be deterred from voicing our concerns. Only then can we take the appropriate action.

MTC Flextek's values



TRUST

We keep our promises



CUSTOMER UNDERSTANDING

Customer understanding that makes anything possible



COOPERATION

Success comes from working together

ETHICAL GUIDELINES – CODE OF CONDUCT

Laws and regulations



We comply with laws and the Code of Conduct



We are committed to fair competition and we are fair



We comply with international sanctions

Integrity



We do not accept corruption or bribery



We avoid conflicts of interest



We respect confidentiality and privacy

Responsibility and people



We treat everyone equally



We promote occupational health and safety



We operate sustainably

LAWS AND REGULATIONS



We comply with laws and the Code of Conduct

We comply with the law and ethical principles in everything we do, without exception.

We aim to be a reliable partner to all our stakeholders, so ethical behaviour and social responsibility and at the heart of everything we do. As a part of these values, we are committed to complying with all applicable laws, regulations and internal guidelines.

We also require all our partners to comply with the law and ethical principles.



We are committed to fair competition and we are fair

We comply with the applicable competition legislation and operate fairly towards all stakeholders.

We do not engage in any activity that could impede or prevent effective competition. We only collect information about competitors in an honest and lawful way from publicly available sources.

We select partners and suppliers who follow similar principles on competition and fairness.



We comply with international sanctions

We comply with all financial and commercial sanctions applying to our business.

We are committed to ensuring that all our business decisions and activities concord with such sanctions.

We do not engage in direct or indirect business with any person or entity on the sanction list.

We do not engage in direct or indirect business with any state or region on the sanction list.

INTEGRITY



We do not accept corruption or bribery

We have zero tolerance for corruption and bribery.

We do not promise or pay bribes or illegal payments to officials or any other parties, nor do we encourage or instruct anyone to pay them.

We do not accept bribes or compensation that could affect the impartiality of decision-making.



We avoid conflicts of interest

All decisions are in the employer's best interests.

Personal interests or relationships do not affect decision-making. We try to avoid ending up with conflicts of interest.

We also require our personnel to be transparent if any situations arise that could lead to a conflict of interest.

MTC Flextek does not engage in political activity.



We respect confidentiality and privacy

We respect trade secrets and other confidential information.

We uphold the secrecy of all confidential information we receive about a company's operations, personnel, customers and partners, and we do not disclose such information to anyone other than the parties concerned.

We take appropriate measures to ensure data protection and the secrecy of confidential information.

RESPONSIBILITY AND PEOPLE



We treat everyone equally

We respect human rights and treat everyone equally.

Equality and fairness are key principles in our recruitment, remuneration, employment benefits, access to training, and career progression.

We do not permit any form of harassment or bullying in the workplace. Everyone is responsible for acting fairly and contributing to an agreeable and inspiring work atmosphere. Everyone has the freedom of expression and also the responsibility for it.



We promote occupational health and safety

We work together with our personnel to promote occupational health and safety.

Healthy employees are a prerequisite for success. We endeavour to take into account the balance that employees need between work and private life. We also aim to identify the mental and physical stress factors of work at the earliest possible stage. We emphasise the importance of preventive occupational health care.

A safe working environment is a must for occupational wellbeing. Everyone is responsible for complying with the occupational safety guidelines. It is also important for us to report safety deficiencies, hazards and procedural errors. Even one accident in the workplace is one too many.



We operate sustainably

We are committed to responsible business operations in terms of people, governance and the environment.

We assess the social and environmental impacts of our activities and work with our stakeholders to invest in actions with positive impacts on them.

We promote environmentally efficient solutions and respect environmental values. We have a responsibility towards future generations.

Raising concerns

We are all responsible for complying with the Code of Conduct, anti-corruption principles, other internal guidelines, and legislation.

The Code of Conduct describes the principles for doing the right thing. Violations of the Code of Conduct are investigated and could lead to internal disciplinary measures, even dismissal. Illegal activity is reported to the authorities.

If we suspect abuse, we are obliged to report it. We must never assume that someone else has reported a hazard or concern.

All reports are investigated thoroughly, and all related communication is confidential whenever possible. Personal data is processed appropriately.

Reporting abuse or concerns

1. Actions contravening the guidelines should always be discussed, primarily with a supervisor.
2. If you feel uncomfortable talking to your supervisor, you can submit a report to your supervisor's supervisor, HR or the CEO.
3. If you suspect an offence, you can send an anonymous or confidential message via the whistleblowing channel.

* We are aware that the Code of Conduct does not cover every possible circumstance and situation. The Code can be altered if necessary. MTC Flextek's Board of Directors approves the Code of Conduct.

