

Code of Conduct

PREFACE

Gebwell Group (hereinafter “Gebwell”) is committed to conducting its business in a sustainable and responsible manner. This Code of Conduct is strongly supported by our company’s values: customer orientation, innovation, desire for development, reliability, and partnership. This Code of Conduct includes guidelines concerning our obligations towards our business environment, employees, business partners, and society. The Code of Conduct is supplemented by individual principles and guidelines applying to Gebwell as a whole.

Our business is based on high ethical standards. We believe that our excellent reputation contributes to our success.

We expect our employees, business partners, suppliers, and customers to act in accordance with the principles set out in this Code of Conduct.

COMPLIANCE WITH LAWS

We always comply with the legislation and regulations of the country in which we operate. It is the responsibility of all employees to be aware of relevant laws affecting their job duties and, in case of doubt, to seek advice to ensure compliance.

CORPORATE SOCIAL RESPONSIBILITY

We respect and adhere to the principles set out in the United Nations Universal Declaration of Human Rights.

We do not accept child labour or other forms of forced labour.

We support freedom of association, and all employees have the right to be a member of a trade union and participate in collective bargaining.

We do not discriminate against our employees or job applicants based on gender, nationality, religion, race, age, disability, sexual orientation, political opinions, trade union membership, or social or ethnic origin.

We seek to build a workplace that is desirable for all of our employees, where they are treated with equal respect and dignity. We also promote a culture of equal opportunity and diversity. We do not tolerate any form of harassment or workplace bullying.

HEALTH AND SAFETY

We provide a safe and healthy working environment in compliance with applicable laws and regulations, and are committed to continuously improving occupational health and safety. Our objective is to prevent accidents and to mitigate health and safety risks in the workplace.

We expect our personnel to take responsibility for their own safety and the safety of others in the workplace.

We develop innovative products and services and aim to minimise the health and safety risks associated with their use in our product development and with our quality assurance methods, as well as by developing our other internal processes and guidelines.

ENVIRONMENT

We comply with environmental legislation and practices that protect and sustain the environment. We also take environmental aspects into account in our product development. We seek to improve the energy efficiency of our operations, reduce the amount of waste, and protect the environment.

Where possible, and if practical, we prioritise ecologically sustainable products and services from suppliers.

INTEGRITY

We strive to be a reliable partner for our business partners, suppliers, and customers.

Our employees and managers are expected to serve Gebwell's interests and act responsibly in doing so. Situations where personal interests may conflict with those of Gebwell must be avoided. All business relationships must be established based on objective criteria.

We are committed to combating corruption in all its forms, including extortion and bribery. We do not use bribes or other unlawful payments, nor do we authorise these payments to gain or maintain business.

We neither offer nor accept any favours, gifts or benefits that could reasonably be assumed to influence decision-making in our company or that exceed the limits of normal entertainment expenses.

MONEY LAUNDERING

We do not accept, facilitate or support money laundering. We conduct business only with reputable parties involved in legitimate business activities, with funds derived from legitimate sources.

FAIR COMPETITION

We promote fair and honest competition. We comply with applicable competition laws regardless of the market area, and refrain from entering into or carrying out any illegal activities.

COMPANY ASSETS

All employees are responsible for taking good care of Gebwell's assets, including physical property, financial assets, intellectual property, and confidential information. Employees are obliged to use assets only for legitimate business purposes and to protect them from loss or inappropriate use. Our funds may not be used for unlawful or improper purposes.

We protect the confidential materials and information entrusted to us by our subcontractors, suppliers, or customers.

IMPLEMENTATION AND COMPLIANCE

All employees and managers at every level of management must comply with this Code of Conduct. Supervisors are in charge of introducing the Code of Conduct to existing and new employees.

Failure to act in compliance with this Code of Conduct may result in appropriate disciplinary actions.

26.3.2021

JRa

We encourage our employees to report any concerns or violations of this Code of Conduct to their immediate supervisor, management, or human resources representative. Persons reporting such violations in good faith will not face any adverse work-related sanctions.

UPDATING

Gebwell's Board of Directors has approved and inspected this Code of Conduct on 17 March 2021.

The Board of Directors may review this Code of Conduct and update it as necessary. Additional instructions concerning the application of this Code of Conduct may be given in separate guidelines.

Gebwell Ltd

Patruunapolku 5, 79100 LEPPÄVIRTA, Finland | tel. +358 20 1230 800 | fax +358 17 554 1102 | info@gebwell.fi |
www.gebwell.fi

Business ID: 2008956-7 | Registered office: Leppävirta