



# CODE OF CONDUCT

## SUPPLIERS

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**BEVENIC**



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# 1. INTRODUCTION

## Jukka Rautiainen CEO

Bevenic Oy's Code of Conduct is not just a document that lists matters in accordance with good practice.

The Code of Conduct is an operating model that every Bevenic employee is familiar with, internalized and committed to. We want the same responsibility from our partners.

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## 2. VALUES

Our shared values guide our operations. Bevenic Oy's values are:

### **Trusted partner**

We are an easily approachable and reliable partner for the customer. We work openly together with our partners, considering their special needs and wishes. We make the everyday life of our partners easier.

### **Responsible**

We take responsibility for both people and the environment, and we always act ethically and fairly. We always demand the best from ourselves in everything we do.

### **Expert**

The continuous bold development and renewal of our operations and expertise together with our partners are key factors for success together.

## 3. LAWS AND POLICIES

We comply with laws and regulatory requirements in all our operations. We actively monitor changes and update our operations whenever necessary.

The policies that define our own operations are available to all personnel and are easy to return to if necessary.

## 4. SUSTAINABILITY

We have built our sustainability programme considering the points of the United Nations 2030 Agenda for Sustainable Development. The four focus areas of our sustainability programme are:

1. Service quality and sustainability
2. Availability and well-being of skilled personnel
3. Reducing environmental impact
4. Customers' sustainable business solutions

With responsible management, we aim to take care of the well-being and competence of our personnel, engage employees and ensure the continuity of operations.



We are also committed to responsible sourcing and require our suppliers to comply with sustainability laws and the principles of this Code of Conduct.

We set requirements for our suppliers and expect them to set similar requirements and take them forward in their own supply chains. These requirements are related to, for example, the origin of raw materials, fair working conditions, and the prohibition of child and forced labor.



## 5. HUMAN DIGNITY

We respect the universal human rights defined in the UN Universal Declaration of Human Rights. Such fundamental rights include freedom of thought, opinion, expression, religion and peaceful assembly, as well as non-discrimination on the grounds of race, age, nationality, gender or sexual orientation.

For us, employees are the cornerstones of our operations, an important investment that we want to invest in. All our employees are equal, and the goal of our operating model is that every Bevenic Oy employee feels that they belong to a group where they are cared for.

We do not tolerate any form of harassment of people, discrimination, bullying, or any activity that can lower people's human dignity.

## 6. RESPECT FOR THE EARTH

We comply with the environmental laws related to our operations and pay attention to the impact on air, water, soil and biodiversity.

With all our activities, we aim to reduce the burden on nature. It is of paramount importance to us to minimize the use of unnecessary natural resources, recycle as efficiently as possible, and consider the risks that different choices can cause to nature.

## 7. HEALTH AND SAFETY

An important idea for us is that people will come to work tomorrow as well. We can only achieve this by taking care of the occupational safety and well-being of our personnel. We carry out different work phases with health first, and we never compromise on these things.

## 8. COMMITMENT

To achieve our goals, we need committed personnel. We ensure the commitment of our personnel through responsible management that respects everyone and by taking care of well-being and safety at work. We listen to and engage employees at all levels of the organization. Each member of Bevenic Oy's personnel has their own responsibilities and obligations. We also have operating models in place for resolving abnormal situations and an anonymous whistleblowing channel for reporting misconduct.



## 9. ZERO TOLERANCE OF BRIBERY AND CORRUPTION

Our main principle is that corruption and bribery in all its forms are strictly prohibited. We never offer or pay bribes to officials or individuals. We also never ask for or accept bribes.

We will never give, offer, solicit or accept any valuable gift or service, directly or indirectly (e.g. through a third party acting on behalf of the Company) for the purpose of influencing a business decision or providing a business advantage that is inappropriate for either party.



## **10. FAIR PARTNERSHIP, WE KNOW OUR PARTNERS**

We strive to be fair, honest and open in all our operations. Successful cooperation with our customers and stakeholders creates opportunities for a growing and successful business.

The risk of getting involved in illegal activities is lower when customers and partners are known. We select our partners carefully and require that our partners comply with the law in their own operations.

We do not accept money laundering in our operations or in the operations of our partners. Money laundering is an activity that aims to conceal the identification, origin or destination of money linked to criminal activity through financial transactions. We strictly comply with all anti-money laundering laws to prevent money laundering. In addition, we comply with the trade sanction programs related to our operations. We therefore monitor the activities of our customers and partners to ensure that we do not work with parties on the sanctions list. We carry out due diligence checks related to these matters with particular care.

## **11. STAKEHOLDER RELATIONS**

We strive to be a reliable partner for our key stakeholders. We want to understand the expectations of our stakeholders and engage in dialogue with different stakeholders to discuss Bevenic Oy's goals, operating principles and operational challenges. We respect the right to dissent opinions and strive to engage in dialogue with stakeholders and communities. We also expect our partners to pursue common interests and engage actively in cooperation.

# 12. COMPETITION LAWS COMPLIANCE

Competition laws protect and promote effective competition. They prohibit agreements and practices that restrict competition. Competition laws also regulate the operations of companies in a dominant market position. We comply with competition-related laws in all our operations and:

1. We are not involved in price or bidding cartels, market or customer allocation, boycotts or production restrictions.
2. We do not discuss sensitive topics or exchange related information with our competitors in violation of competition laws.
3. Contacts and agreements made with competitors and participation in the activities of industry organizations must always comply with Bevenic Oy's internal rules.
4. We do not enter into agreements with customers, distributors, suppliers or other partners prohibited by competition law.
5. If our company has a dominant market position, we will not abuse it.



## **13. SANCTIONS REGULATION COMPLIANCE**

International sanctions refer to the restriction or suspension of economic or trade cooperation and, for example, transport and communications links with a certain country or certain groups. The purpose of sanctions is to influence the policies or activities of a state or group of people that threaten international peace and security. The manifestations of sanctions include export and import restrictions and financial sanctions. From a Finnish perspective, the most important sanctions are imposed by the United Nations Security Council, the European Union and the United States. Like other companies operating in the international market, we take national and international sanctions into account when operating in an international environment.

## **14. ASSET MANAGEMENT AND PROTECTION**

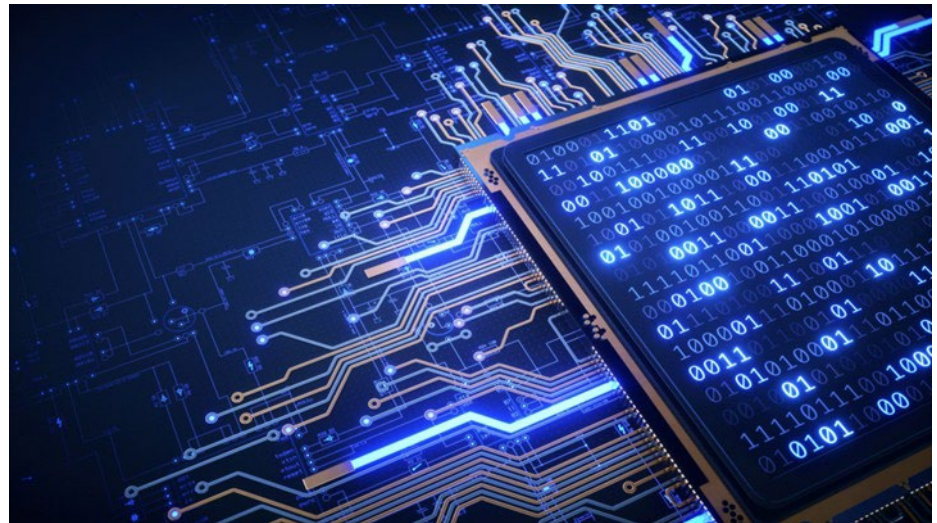
In our work, we handle the property and confidential information of Bevenic Oy and its business partners, and we must treat it carefully. Our property or the work of other employees may not be used for one's own benefit against the interests of Bevenic Oy. Appropriate measures must be taken to ensure the confidentiality of confidential information.

Our partners must also properly protect our company's assets in all its forms from misuse and crime.

# 15. INFORMATION SECURITY AND PRIVACY POLICY

We take security and data protection seriously and continuously prevent them from being compromised and to safeguard the confidentiality of information and materials concerning business partners, customers and other stakeholders. The processing of personal data is carried out in accordance with the applicable data protection laws. When handling confidential information, our partners must comply with the care required by the sensitivity of the content and local requirements for the handling of personal information.

We are familiar with data protection regulations and only collect and process personal data for appropriate business purposes. We ensure the accuracy of the personal data we process and rectify inaccurate data. When we no longer need personal data, we will dispose of it in accordance with our privacy policy. We keep sufficient and up-to-date data protection information available on data subjects.



# 16. SUPPLIERS' CODE OF CONDUCT

We actively strive to reduce the environmental impact of our operations and improve economic and social well-being. Therefore, we require all our suppliers and business partners to commit to the above-mentioned operating methods. The goal is that open and effective cooperation creates value for both parties and the entire supply chain.

## ACCEPTANCE

We accept the above-mentioned Code of Conduct for Bevenic Oy's suppliers and are obliged to comply with the Code of Conduct in our business operations.

Our key supply chain management tools include counterparty risk assessment, supplier qualification and supplier audits.

**SUPPLIER NAME:**

**STREET ADDRESS:**

**ZIP CODE:**

**COUNTRY:**

**PLACE AND DATE:**

**SIGNATURE:**

**TITLE:**

**STAMP (if available)**

Please return all scanned pages of the signed agreement to Bevenic Oy's contact person.

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