

1 Greetings from the CEO

Elomatic offers design services, special expertise, digital solutions and turnkey deliveries based on its own technologies and expertise for the sectors it has chosen. As a significant player in our industry, we play an important role as a social influencer and developer of our industry. We aim to be a responsible partner in designing solutions that enhance environmental and human well-being. That is why we must act ethically and in a sustainable way.

The Code of Conduct guides our daily work. It reminds us of how we treat each other and how we interact with our customers and other partners. Sustainability starts with each one of us – around the world, we at Elomatic are committed to following these principles. We also require responsible practices from our partners and other stakeholders. In unclear cases, we boldly end cooperation that is contrary to our Code of Conduct.

The expertise of our people and our commitment to ethics and good business practices are not only enablers of today's success – they also build sustainable growth in the future. By following the Code of Conduct, we implement our strategy, achieve our goals and ensure that our ways of working are something we can be proud of.

*In unclear cases, we boldly decide
against cooperation that goes against our principles.*

2 Values guiding our operations

The values guiding Elomatic's operations have been summarized together among all Elomatic employees as follows:

We succeed together

- We help our customers and each other to thrive
- We respect each other
- We celebrate successes together

We have a passion to improve

- We are proactive and curious
- We try to improve every time
- We have the courage to move forward

We are trustworthy

- We act openly and clearly
- We bear our responsibilities
- You can rely on our expertise

3 Our people – the source of our strength

The foundation of our success lies in our highly skilled employees. We want to continue to nurture their motivation and well-being – and at the same time be the number one choice in the industry for new professionals.

- We comply with local labour legislation and other local agreements and regulations in the countries where we operate.
- We do not favor or discriminate against anyone in recruitment, selection for training, or the allocation of new tasks. We treat everyone equally regardless of, for example, gender, skin color, nationality, ethnic background, language, social status, religion, physical or mental capacity, political or other opinions, family relationships or sexual orientation.
- We take care of the occupational health and safety of our personnel. Our internal guidelines meet or exceed the requirements of legislation. We aim to prevent accidents and factors that are harmful to health, and to promote the well-being of the individual and the work community through safe working methods.
- We support the well-being of our personnel at work by promoting work-life balance and by identifying mental and physical stress factors as early as possible.
- We offer our employees training opportunities that support the requirements of both current and future jobs.
- We respect internationally recognized human rights, and we have written instructions on how to prevent harassment and inappropriate treatment. This covers, among other things, the following principles:
 - We do not tolerate discrimination, harassment or bullying, whether based on age, gender, skin color, nationality, ethnicity, language, social status, religion, physical or mental capacity, political or other opinions, family relationships or sexual orientation.
 - Our employees have the right to organize, establish and join trade unions to safeguard their interests, and to participate in collective agreement negotiations.
- We offer summer jobs and internships as well as other fixed-term job opportunities. We also participate in the development of training programs in our divisions.
- We do not use child labour, and we do not accept any form of forced labour, such as prison labour. For people under the age of 18, we follow the current restrictions on working hours and work tasks. We also require all our stakeholders to fully implement these principles.
- We follow internal rules that support the well-being, healthy lifestyles and safety of our personnel both during and outside working hours.

*We do not favor or discriminate against anyone in recruitment,
selection for training or the allocation of new tasks.*

4 Our customers – our partner in development

Our mission is to improve our customers' competitiveness responsibly and in accordance with the principles of sustainable development. Our goal is to be a reliable partner and the first choice for our customers.

- We ensure that our operations live up to the promises we make to our customers.
- The marketing of our products and services is always truthful and accurate.
- The quality of our products and services is reliable, and quality management is based on guidelines in accordance with the ISO 9001 standard or similar principles.
- We always consider the safety of our customers in our products and services.
- We are constantly developing new solutions that allow us to provide more and more value to our customers.
- We regularly collect feedback from our customers and use it to develop our products and services. We are also actively developing new ways of communicating and collaborating with our customers.
- We work with our customers proactively: we highlight things that we believe will be useful and warn them of the risks we have identified.

5 Our role in society

Good relationships with the surrounding society are important to us.

- We comply with local laws and regulations in all our operating countries.
- We do not tolerate corruption, extortion or bribery of any kind, and we are committed to combating them at all levels.
- We do not support political activity financially or in any other way.
- We actively participate in the development of the entire industry, for example, by cooperating with educational institutions in the field.
- We participate in discussions about the development of local communities.
- We develop new services in cooperation with our citizens and customers.
- We do not cooperate even indirectly with states that oppress other peoples or wage a war of aggression.

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6 Our principle of fair competition

We are in favor of open and fair competition, and we comply with applicable competition law in all our activities. We avoid situations where there could be a risk of violating competition regulations. We do not discuss with our competitors' prices, pricing principles, participation in tenders, our costs, customer projects, strategic decisions or other non-public information that is not known to our competitors.

7 Minimising our environmental impact

In our projects, we develop solutions that promote the well-being of the environment and people together with our customers – environmentally friendly and responsible operations are part of our operating principles. We consider society's general environmental expectations, such as sustainable development and environmental protection. In addition, we take into account the environmental load caused by our own operations and strive to minimize its impact.

- We are committed to reducing the energy consumption, waste and greenhouse gas emissions caused by our operations.
- In project activities, we help our customers and partners to operate in accordance with the principles of sustainable development, paying special attention to energy and material efficiency. We are constantly developing new, more environmentally friendly solutions.
- We strive to create a sustainable living environment and invest in the development of new innovations in the field.
- We follow an up-to-date travel policy.

*We strive to create a sustainable living environment
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8 Avoiding conflicts of interest

Our personal interests do not influence our decision-making. We avoid conflicts of interest that could impair our judgment in business. We do not engage in any activity in or outside of our work that could damage Elomatic's reputation. Nor do we seek to benefit ourselves, our own team or any individual part of Elomatic at the expense of the Group's success. We handle the company's assets responsibly and critically assess expenses.

9 Communication

Our communication is honest, transparent, equal and topical. In both our internal and external communications, we comply with the legislation and official regulations that apply to us, as well as our own policies. To avoid greenwashing, we have drawn up guidelines for external communication based on the EU's upcoming Green Claims Directive.

We build a safe environment with both actions and words. Therefore, we expect that the style of both Elomatic's personnel and official communication is always respectful, consensual and striving for constructive dialogue. We use clear and understandable language on all our channels and ensure that our digital materials comply with general accessibility principles, such as the Accessible Rich Internet Applications (ARIA) standard. We are constantly developing our communications policy based on feedback received and changing stakeholder expectations.

10 Privacy and information security

We respect privacy and comply with good personal data processing practices and applicable legislation. We collect, use and store personal data only when it is justified for our operations. Everyone who has access to personal data has a responsibility to use it responsibly, to protect it from unauthorized access and to prevent it from falling into the wrong hands. We ensure the accuracy of the personal data we process, and we rectify or delete inaccurate data without delay. When personal data is no longer needed, we will dispose of it in accordance with our privacy policy.

We take care of information security by following internal guidelines and information security standards. We ensure that the information remains confidential, intact and accessible only to those who have the right to do so. We keep our information networks and services up to date and ensure that our personnel's information security expertise is updated. We classify and protect confidential information of our customers and stakeholders and do not disclose it elsewhere. We report information security incidents without delay, and the lessons learned from them are part of the continuous improvement of our information security.

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11 Adherence to the Principles and reporting violations

This Code of Conduct has been drawn up for the benefit of the entire Elomatic Group, and compliance with them is the responsibility of the entire organization. Every employee must be familiar with the up-to-date instructions related to their own work. We ask you to report any misconduct to your supervisor, their supervisor or HR. We encourage business partners and stakeholders to notify the Group management if they suspect a violation of the law or Elomatic's Code of Conduct. We require the same principles from all our stakeholders and partners. We always report any ethical

deficiencies or suspicions to the management of the party concerned.

Elomatic has a procedure in place that allows employees to report discrimination, ethical violations, inappropriate treatment or other problems without fear of negative consequences. We also have a clear process in place to investigate ethical and legal violations and to take the necessary disciplinary action. All compliance concerns are investigated carefully, anonymously, and fairly in accordance with established practices. Under no circumstances will we accept retaliation against individuals who sincerely report abuse.

Turku, May 14th, 2025



Tom Lind, CEO

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