

Code of Conduct

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1 INTEGRITY STATEMENT

Integrity is the guiding principle in all of our business activities. To us, integrity means sound corporate governance, honouring contracts, complying with applicable laws and regulations, including applicable sanctions, in each country where Helvar operates, zero tolerance for bribery, fair competition, acting ethically and respecting human rights.

Helvar Oy Ab and its subsidiaries (hereinafter “Helvar” or “we”) are committed to products and services of high quality. In pursuance of the commitment, we promote sustainable development and good corporate citizenship. These values and the integrity principle are fundamental to us. This Helvar Code of Conduct (the “Code”) sets out the framework within which we conduct, manage and regulate our business in order to meet these values and operate with integrity.

The Code and the supporting policies mirror good business practise and common sense. Topics concerning social, environmental and ethical issues also follow the standards set out in the Responsible Business Alliance’s¹ (RBA) Code of Conduct.

This Code is a part of Helvar’s orientation programme and training on the compliance of the Code is organized when necessary.

2 SCOPE

Every employee at Helvar, including the management and the members of the Board of Directors, is expected to fully comply with the Code. Those in management or supervisory role should act as role models.

The Code, where appropriate, is supported by the more detailed policies. The Code outlines the basic principles that govern all that we do, and they help understand what is expected and steer towards the right course of action.

The role of suppliers is considered significant within our activities, therefore next tier suppliers are expected to make a direct commitment to the RBA’s Code of Conduct, or at least equally binding principles. Direct commitment to this Code is expected from any third party who is working for or on behalf of Helvar.

3 THE CODE

3.1 Employment Laws and Human Rights

We are committed to uphold the applicable labour legislation and the human rights of employees. This applies to all employees including temporary, migrant, student, contract, direct employees and any other type of employee. We do not accept child labour, which violates Conventions 138 and 182 of the International Labour Organisation.

We are an equal opportunities employer. Every employee will be treated fairly at all times regardless of their age, gender, religion and ethnicity, or other equivalent factor. We recognise and respect the right of our employees’ freedom of association.

It is the responsibility of each employee to ensure for his or her part that everyone is treated with dignity and respect so that each Helvar employee can work in a harassment-free environment.

¹ <http://www.responsiblebusiness.org/code-of-conduct/>, formerly the Electronic Industry Citizenship Coalition (EICC).

3.2 Health and Safety

We protect the health and safety of employees and any contract labour and minimise any adverse work conditions. Employees are provided with appropriate protective equipment where necessary.

We implement healthy and safe work practices to prevent injury, illness and property damage and train employees to assure their continued commitment to their own health and safety and that of their co-workers.

It is the responsibility of each employee to ensure for his or her part that all safety instructions and procedures are fully complied with.

3.3 Caring for Environment

The production at our factories operates on a level that respects environmental elements including energy consumption, waste management and chemicals handling; we have a certified ISO14001 environmental management system. The material contents of our products comply with all applicable laws and regulations. Customer requirements for hazardous substances are recognised and complied with.

We are committed to following all applicable legal requirements and implementing required actions.

It is the responsibility of each employee to ensure for his or her part that all instructions and procedures designated to protect the environment are fully complied with.

3.4 Securing Privacy

We respect the privacy of our employees, customers and suppliers, and everyone we do business with. We are committed to handle personal data in compliance with privacy and information security laws, including GDPR, where applicable, and regulatory requirements when personal information is collected, stored, processed, disclosed, transferred, transmitted and shared.

It is the responsibility of each employee to ensure for his or her part that personal data is handled responsibly.

3.5 Intellectual Property and Confidential Information

We possess intellectual property such as patented and potentially patentable inventions and trademarks. We own other forms of confidential and proprietary information, too, such as strategies and financial data. Also, our business partners have trusted their intellectual property or confidential information to us under non-disclosure agreements. The disclosure of these to any third party would cause significant damage to us and/or our business partners.

We are committed to the protecting of the intellectual property and confidential information.

It is the responsibility of each employee to ensure that we handle our confidentiality obligations appropriately, and that we protect our proprietary information and intellectual property.

3.6 Zero Tolerance for Bribery and Corruption

Corruption means abuse of a position of trust in order to gain an undue advantage. Bribery means offering or promising an improper benefit to obtain or retain a commercial advantage. Bribes can be, for example, money, gifts, hospitality or entertainment.

We have zero tolerance for bribery and corruption. It is forbidden to give money or anything else of value to any public official or any customer or business partner, directly or indirectly, for the purpose of securing favourable decisions, sales or services for Helvar. In addition, it is also forbidden for a Helvar employee to accept something of value from any party in such circumstances that may create a conflict of interest or the appearance of a conflict of interest. For instance, it is not allowed to receive gifts or

hospitality from those seeking business with us. Furthermore, we allow no facilitation payments that are primarily used to facilitate or expedite certain procedures or services, e.g. customs clearance.

It is the responsibility of each employee to ensure that no personal gifts are not given or received unless there is a special occasion in which a gift with a small value may be acceptable. As a representative of Helvar you may receive or offer reasonable hospitality which always has to be reported to your line manager.

3.7 Enshrining Fair Business

At Helvar, we honour our contracts. We do not accept manipulative or illegal trading practices.

We are committed to fair competition and observe all relevant competition laws. These laws generally prohibit agreements or arrangements between us and competitors that can affect prices, terms and conditions of sale or fair competition. Under no circumstances do we accept distortive actions, cartel arrangements or abuse of dominant position.

It is the responsibility of each employee to ensure for his or her part that our business relationships are based on fair competition without influence from improper activities.

3.8 Conflict of Interests

A conflict of interest is a situation in which a person is involved in multiple interests, one of which could possibly have a discrepancy with the interests of Helvar.

Our employees should engage in no activity, direct or indirect, in which their personal interest and those of Helvar might present an actual or potential conflict of interest. A conflict of interest occurs when, for example, our employee has a secondary employment with our supplier, customer or contractor. Also, a conflict of interest may occur when an employee's family member works at our supplier, customer or contractor.

It is the responsibility of each employee to ensure that they exclude themselves from the relevant project or decision-making position in a case of potential conflict of interest.

3.9 Disclosure of Information

All business dealings should be transparently performed and accurately reflected on Helvar's business books and records.

Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4 GUIDANCE AND REPORTING

All employees are individually responsible for knowing and complying with this Code. If employees are unsure how to apply this Code they should contact their supervisor or Helvar Merca Group Chief Compliance Officer (Helvar Merca MD).

We want to foster a culture of freedom of speech, and we want to encourage our employees and others to voice their concerns with confidence. We take all reports and concerns seriously.

It is the responsibility of each employee to immediately report any breach or suspected breach of this Code primarily to his or her line manager. Alternatively, employees may report to Helvar Merca Group

Chief Compliance Officer (Helvar Merca MD) or through Helvar's whistleblowing channel. We encourage everyone to put his or her name to the allegation, albeit concerns can be submitted anonymously, for example through Helvar's whistleblowing channel. If you wish to be anonymous, we will not disclose your identity unless required by law. You will not face adverse consequences due to a report made in good faith.

All suspected violations are investigated and potential corrective actions implemented.

Violation of the Code is subject to a disciplinary action up to and including discharge.

5 APPROVAL OF THE CODE

Chief Financial Officer is responsible for the monitoring of the Code.