

# GINOLIS GROUP CODE OF CONDUCT

# For Business Partners

### 1. Introduction

GINOLIS Oy, Reg. 2344452-8, is the parent company of a group of companies (the "GINOLIS Group"), which consists of several subsidiaries Together, the GINOLIS Group provides technology, products and services for advanced manufacturing automation.

The whole GINOLIS Group is committed to the Ten Principles of the United Nations Global Compact, treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible, ethical operations.

As a Business Partner (suppliers, distributors, etc) to any company within the GINOLIS Group, you are an essential part of the GINOLIS Group structure and therefore we expect you and your suppliers to also commit to the following social, environmental, and ethical responsibilities.

### 2. Human rights and labor conditions

The GINOLIS Group is committed to supporting the protection of internationally proclaimed human rights of workers and treating them with respect and dignity. This applies to all workers, including, but not limited to, temporary, student, migrant, contract, direct employee, and any other type of worker. Business Partner shall conduct its business and operations in a way that it is possible to identify, prevent, mitigate and account for negative human rights impacts throughout its entire supply chain.

# 2.1 Modern slavery and forced labor

Our Business Partners are expected to prevent any involvement in any forms of modern slavery and forced labor throughout its supply chain by having adequate policies, risk assessment and due-diligence processes in place. All work should be voluntary on the part of the employee and the supplier as an employer must provide all employees with a written contract in a language they understand clearly, indicating all employment terms and conditions.

# 2.2 Child labor

The Business Partners must ensure that child labor is not used in any performance of any work. "Child" means any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the International Labor Organization (ILO), whichever is greatest. All workers under the age of 18 shall not be exposed to work that is likely to harm their health, physical, mental, social, spiritual, or moral development.

### 2.3 Working hours and leave

The GINOLIS Group expects its Business Partners to comply with applicable laws and ILO standards regulating working hours and leave, maintaining reasonable working hour schedules for its employees and providing a rest period of at least 24 consecutive hours in every week. All hours worked beyond the default schedule shall be voluntary and the collective bargaining agreements shall be respected.

### 2.4 Wages and benefits

All Business Partners' employees must receive at least the minimum wage required by local laws and provide all legally requisitioned benefits. In addition, the Business Partners must always comply with the collective bargaining agreements and provide its workers with information regarding their employment terms and conditions in a language spoken by them. We encourage our Business Partners to adopt a fair payment structure that matches its employee skills.

### 2.5 Non-discrimination and fair treatment

The Business Partners must ensure that all employees are treated with dignity and respect, eliminating discrimination in respect of employment and occupation, providing equal employment conditions and opportunities based on each worker's skills and experiences, not discriminating any job applicants based on race, color, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, covered veteran status, body art, among others. Workers' religious practices will be reasonably accommodated. Any involvement in any kind of harassment, abuse, corporal punishment or inhumane treatment must be prevented.

#### 2.6 Freedom of association and collective bargain

All employees shall have the right to associate freely, seek representation and bargain collectively in accordance with local laws. The GINOLIS Group expects its Business Partners to respect the rights of workers to communicate openly, making possible for all employees to share grievances with management about labor conditions with no fear of harassment.

#### 2.7 Affected communities

The GINOLIS Group expects its Business Partners to avoid and prevent continued adverse impact on potentially vulnerable groups or affected communities such as indigenous people, women, national or ethnic, religious and linguistic minorities, children, people with disabilities, migrant workers and their families and human rights and environmental defenders.

### 3. Information protection

#### 3.1 Sensitive, confidential, and proprietary information protection

All sensitive, confidential and proprietary information must be protected in an efficient manner by the Business Partners and it is crucial that all data privacy laws and regulations are followed.

The Business Partners shall respect GINOLIS Group and others confidential information and intellectual property, including personal data/information, from mishandling, misuse, theft, counterfeit, fraud or any improper disclosure, including diminishing risk to digital systems and documents by executing appropriate IT cyber security programs, using encryption and strong passwords. IT suppliers should provide work, services, tasks and deliverables in compliance with the agreed industry standards and practices, which may include some of the following: ISF Standard of Good Practices for Information Security and ISO 27001, ISO 27002, ISO 22301, ISO 22313 and ISO 27031 standards.

In case of any data breach or suspicion of security incident, all Business Partners are expected to communicate with the GINOLIS Group or the appropriate GINOLIS Group company in a rapidly attitude.

### 3.2 Intellectual property

The compliance with all applicable laws regarding intellectual property and protection against disclosure is required from all Business Partners.

### 4. Environment, health and safety

### 4.1 UN Sustainable Development Goals

The UN Sustainable Development Goals (SDGs) aim to end poverty and inequality, protect the planet and ensure that all people enjoy health, justice and prosperity. Since 2015, all countries in the United Nations adopted the 2030 Agenda for Sustainable Development. All GINOLIS Group companies are working towards these goals and our Business Partners are expected to act in a similar way, so that together we help in transforming our world for the better.

# 4.2 Environmental, health and safety management system

Considering the environmental risks normally present in a business operation, we expect our Business Partners to conduct its activities aiming to minimize these risks. It is desirable that the Business Partner establishes an adequate environment management system (such as ISO14001 or comparable), adheres to policies and procedures to embrace environmental aspects into its operations, supply chain and products.

A health and safety management system (such as ISO42001 or comparable) is also advisable to be implemented by the Business Partner, as well as policies pursuing the protection of health, safety and welfare of employees, contractors, visitors among others that may be affected by their occupation. The working environment must be under good sanitary conditions and our



Business Partners should take reasonable measures to secure that worker's performance and safety is not compromised by controlled substances, alcohol, legal and illegal drugs.

# 4.3 Substances and chemical management

Any potentially hazardous substances in chemical products and articles used in the Business Partners' products must be identified as such by the Business Partner. The Business Partners must ensure that these substances are handled, transported, stored, recycled and disposed of safely.

# 4.4 Sustainable product and process development

Sustainability is a key indicator in the GINOLIS Group Business Partners qualification and the Business Partners are expected to make their best effort to develop, manufacture and deliver innovative products and processes with the lowest possible environmental impact. The aspiration is that the Business Partners should reduce its climate change impact, use energy, water and natural resources in an efficient manner, reduce waste and use of hazardous materials, utilize reusable and/or recycled packaging material and manage its emission in the air. We require our Business Partners to measure, report, improve and if material impact present a mitigation plan. GINOLIS will work together with its Partners in its value chain to minimize the carbon footprint.

# 4.5 Climate change

Considering that climate change is one of today's most serious challenges, the GINOLIS Group expects its Business Partners to have a net zero Paris aligned target for the climate impact of its value chain and to integrate climate considerations in its business decisions.

### 4.6 Biodiversity and ecosystems

Biodiversity is essential for the processes that support all life on Earth, including humans. The GINOLIS Group expects its Business Partners to manage natural resources responsibly, minimizing the risk for biodiversity impact.

# 4.7 Pollution

Air pollution continues to have significant impacts on the health of people, particularly in urban areas. These health impacts have economic costs, cutting short lives, increasing medical costs and reducing productivity through lost working days. The Business Partners are expected to reduce the impact to air pollution in its operations to minimum levels.

# 4.8 Water and marine resources

Freshwater is a scarce commodity and essential for sustaining life. In a global perspective, billions of people live in regions vulnerable to freshwater stress and/or flooding. The Business Partners are expected to reduce the impact to water and marine resources in its operations to minimum levels.

# 5. Governance and management system

Business Partners are expected to adopt or establish a management system to carry the responsibilities listed in this Code of Conduct. The management system shall ensure transparency within the Business Partners' operations: (a) comply with our requirements and applicable laws and regulations; (b) conform to these responsibilities; and (c) identify and mitigate operational risks related to these responsibilities.

Employees and third parties must be able to seek advice or raise ethical or legal concerns without fear of retaliation through adequate reporting channels such as a whistle-blower platform or anonymous hotline. If a report is made, the Business Partner is expected to address those cases in an ethic manner and prevent retaliatory actions.

# 6. Product safety

GINOLIS Group companies are shaping the future of health and for that reason we expect that all Business Partners ensure that their products and services follow maximum quality and safety standards. Any accident/incident that may result in any product safety issues must be reported by our Business Partners immediately in order to avoid the sale or use of a faulty product by any GINOLIS Group company or its distributors.

# 7. Business ethics

# 7.1 Anti-corruption laws

All anti-corruption laws and regulations applicable to the Business Partners' obligations towards the GINOLIS Group must be observed and complied with. It is also desirable that the Business Partner establishes a compliance program aiming to mitigate the existing risks of its activities and to prevent corruption in different situations such as commercial contracts, partnerships, projects, and the use of contractors or similar. The Business Partner shall not be involved with, endorse nor tolerate any form of bribery or corruption, directly or indirectly and no improper benefit shall be offered or accepted by any of its employees and representatives.

### 7.2 Illegal payments

No illegal payments or anything of value from any customer, supplier, representatives, agents, government officials, political parties or others must be offered or accepted by the Business Partner and/or its employees. "Illegal payments" includes payments aiming to expedite or secure performance of a routine governmental such as customs clearances or visa expedition, with exception of formal legal governmental fees for such services. It is expected that the Business Partner restrains its employees from equal or similar conduct in order to gain improper advantage, even in areas where such behavior may not violate local regulations or laws.

### 7.3 Competition and antitrust

The Business Partners shall respect and comply with all applicable anti-trust, competition and fair-trade laws and regulations and shall not enter into any anti-competitive arrangements like illegal price-fixing, limiting supply or allocating/controlling markets or any other illegal restrictive practices that would restrain or impact competition.

# 7.4 Gifts and courtesies

It is desirable that the Business Partners achieve its business goals based on their products and services quality and performance and the use of gifts and courtesies aiming to reach competitive advantage will not be tolerated by any of the companies in the GINOLIS Group. Whenever offering or receiving a gift or business courtesy in any business relationship, the Business Partner is responsible to make sure that such conduct is consistent with reasonable marketplace customs, allowed by applicable laws and regulations and that such act does not infringe the rules and standards of the recipient's organization. Under no circumstances the acceptance or offering of cash gifts or cash equivalent should be authorized.

### 7.5 Insider trading

Any material or non-publicly information disclosed by any employee of the GINOLIS Group to its Business Partners must not be used for trading or empower third parties to trade in the stock or securities of any company.

# 7.6 Conflict of interest

Aiming to demonstrate that the Business Partner is a reliable and honest partner, doing business in a transparent and open manner is crucial, avoiding situations where private, financial or other external interests conflict with the Business Partner's work responsibilities. If any GINOLIS Group employee or anyone performing a work for the GINOLIS Group may have a personal interest of any kind in the Business Partners' business or any kind of financial link with the Business Partner, this situation must be communicated to the GINOLIS Group.