

CODE OF CONDUCT

21.1.2026 / Rev. 1.2

TABLE OF CONTENTS

INTRODUCTION

OUR VALUES AND PURPOSE

LEADERSHIP COMMITMENT AND LAWFUL CONDUCT

OBLIGATIONS OF EMPLOYEES AND MANAGERS

HUMAN RIGHTS AND ENVIRONMENT

ETHICAL BUSINESS CONDUCT

COOPERATION WITH SUPPLIERS

**MECHANISMS FOR IDENTIFYING AND REPORTING ILLEGAL ACTIVITIES
AND ACTIVITIES THAT VIOLATE ETHICAL RULES**

IMPLEMENTATION OF THIS POLICY

INTRODUCTION

Why does this Code of Conduct exist?

EC Electro Center Oy's Code of Conduct defines the principles and expectations that guide responsible, ethical, and professional conduct throughout our organization. It is based on our values and our commitment to act honestly, safely, and lawfully in all situations. The Code reflects EC's corporate culture, which emphasizes cooperation, trust, professionalism, and continuous development.

This Code of Conduct applies to all EC employees, regardless of position. Each of us is responsible for knowing the Code, understanding its significance, and acting in accordance with it in our daily work. The same principles also apply to external parties such as temporary workers, subcontractors, and consultants who represent EC or are part of our value chain. Our expectations for suppliers are defined separately in the EC Electro Center Supplier Code of Conduct.

The Code of Conduct is reviewed regularly and updated when necessary. All updates are approved by EC management to ensure the Code reflects the company's development, changes in the operating environment, and evolving standards of responsibility.

OUR VALUES AND PURPOSE

Our Values

EC Electro Center's values form the foundation of all our activities. They guide our decisions, shape our corporate culture, and define what we expect from one another in every work situation. Our values are practical guidelines that are reflected in customer experiences, internal cooperation, and the way we take responsibility for society and the environment.

Value 1: Customer focus

We listen to and understand our customers' needs and develop solutions that support their goals. Our customer focus is reflected in reliable delivery, fulfilled promises, and safe, functional, and high-quality solutions.

Value 2: Professionalism

Professionalism is a core part of our identity. Strong expertise, technical competence, and continuous development enable us to operate reliably and at a high level. We actively strengthen skills at both individual and organizational levels to meet changing requirements.

Value 3: Creativity and continuous development

We continuously seek better and more efficient ways of working. We encourage new ideas and innovation that improve quality, safety, and environmental performance, helping us remain among the leaders in our field.

Value 4: Solidarity, openness, and team spirit

We foster a respectful and inclusive culture where everyone feels valued and safe. Open dialogue, constructive feedback, and collaboration are essential to achieving the best results together.

By acting in accordance with our values, we build long-term trust, high-quality work, and responsible practices—and a workplace where everyone can succeed.

OUR VALUES AND PURPOSE

Our Purpose

EC Electro Center's purpose is to provide reliable, safe, and sustainable electrical engineering solutions that support our customers' operations and the functioning of society. Purpose is not only what we do, but how we do it.

Our purpose is reflected in our daily work through solutions that meet high quality and safety standards and address real customer needs. We take a long-term approach and develop products and processes that promote energy efficiency, responsible resource use, and reduced environmental impact.

We aim to be a trusted partner in all situations through open cooperation, clear communication, and commitment to quality. Together with our customers, employees, and other stakeholders, we strive for continuous improvement and solutions that meet both current and future needs.

LEADERSHIP COMMITMENT AND LAWFUL CONDUCT

Management commitment and zero tolerance

EC Electro Center's management is committed to ensuring that this Code of Conduct is understood and followed consistently across the organization. Compliance is not optional. We do not tolerate bribery, corruption, discrimination, harassment, or any conduct that violates our values, the law, or this Code.

Managers have a special responsibility to act as role models and to integrate ethical conduct and compliance into everyday decision-making. Violations will be investigated and may result in disciplinary action, termination of employment or contracts, and, where appropriate, reporting to authorities.

Principle of lawful conduct

All actions, decisions, contracts, and transactions at EC Electro Center must comply with applicable laws and regulations. We act lawfully even if unlawful conduct could benefit the company or an individual. No business objective justifies breaking the law.

Employees must never instruct, pressure, or encourage third parties, such as suppliers, subcontractors, customers, or consultants, to act unlawfully or bypass legal requirements.

Accurate reporting and records

EC Electro Center requires that all records, reports, time entries, expense claims, invoices, and other business documentation are accurate, complete, and truthful. This applies to all financial and non-financial information, including sustainability data and operational reporting.

We comply with applicable accounting rules, internal controls, and approval procedures. Creating misleading, incomplete, or false records is prohibited and may result in disciplinary action.

OBLIGATIONS OF EMPLOYEES AND MANAGERS

What is expected from employees

All EC employees are expected to:

- Familiarize themselves with and comply with this Code of Conduct
- Understand their role and responsibilities
- Ask questions when uncertain
- Report suspected violations promptly
- Cooperate honestly in investigations
- Act truthfully and accurately in all work-related matters
- Participate in required ethics and compliance training
- Never retaliate against anyone who raises concerns in good faith

These responsibilities are reviewed regularly to support professional development and effective contribution to company goals.

What is expected from managers

Managers have non-delegable responsibilities to:

- Lead by example and promote honesty and integrity
- Monitor compliance and identify compliance risks
- Take action to mitigate identified risks
- Foster a culture of inclusion, openness, and compliance
- Ensure employees feel safe reporting concerns
- Ensure appropriate compliance training
- Communicate regularly about ethics and compliance
- Handle concerns raised by employees appropriately
- Participate in the courses offered by EC Electro Center regarding preventing corruption and bribery

HUMAN RIGHTS AND ENVIRONMENT

Health, well-being, and safety

Employee health, well-being, and safety are fundamental to EC's responsible operations. We provide a physically and mentally safe working environment and comply with occupational health and safety legislation. Every employee is responsible for working safely and reporting hazards and near misses.

Bullying, harassment, and inappropriate behavior are not tolerated. Management is responsible for addressing well-being concerns promptly.

Environment and circular economy

We operate responsibly and continuously reduce environmental impacts by promoting energy efficiency, resource efficiency, waste reduction, reuse, and recycling. Environmental responsibility is part of everyone's daily work.

Human rights

EC respects internationally recognized human rights and aligns its practices with the UN Guiding Principles on Business and Human Rights, OECD Guidelines, and ILO standards. We do not accept child labor, forced labor, human trafficking, or modern slavery in our operations or supply chain.

Hazardous substances and fire prevention

We maintain safe working conditions, including fire prevention and safe handling of chemicals and materials. Health risks must be minimized through proactive risk management.

Responsible sourcing and conflict minerals

EC strives to avoid raw materials from conflict-affected and high-risk areas and expects suppliers to support responsible sourcing practices.



Electro Center

ETHICAL BUSINESS CONDUCT

Conflicts of interest

Business decisions must always be made in EC's best interests. Personal interests must not influence decision-making. Potential conflicts must be disclosed promptly. Secondary employment and outside activities require prior approval when related to EC's business or when conflicts may arise.

Bribery, corruption, and money laundering

EC does not tolerate bribery, corruption, improper benefits, or money laundering. Facilitation payments are prohibited. Risks are monitored and violations investigated promptly.

Gifts, hospitality, donations, and sponsorship

Gifts and hospitality must be reasonable, transparent, and appropriate. If the value of the gift or hospitality is over 100 euros, it must be approved by the Financial & HR Manager. Cash or cash equivalents are prohibited. Donations and sponsorships must be approved by the Financial & HR Manager, documented, and transparent. Donations to individuals or private accounts are prohibited.

If you are unsure if a benefit, gift and/or hospitality is considered to be appropriate, you must consult your supervisor or the Financial & HR Manager before accepting or offering it.

Fair competition

We comply with competition law and do not engage in price fixing, market sharing, or improper information exchange.

Information security and confidentiality

We protect information assets and respect intellectual property rights. Confidential information must be handled appropriately and returned upon termination of employment.



Electro Center

ETHICAL BUSINESS CONDUCT

Insider information and political neutrality

Insider trading is prohibited. EC operates independently of politics and does not support political parties or campaigns.

Representing EC in public

Employees must act responsibly in public and on social media, protect confidential information, and avoid statements that could misrepresent EC.

COOPERATION WITH SUPPLIERS

EC Electro Center Oy is committed to a transparent and competitive procurement process and to treating our suppliers fairly and responsibly.

Supplier management

The management and fair treatment of suppliers is at the heart of EC's ethical business practices. For this reason, Electro Center requires its employees to maintain high standards and comply with the following guidelines.

Requirements for managing the Electro Center buyers

- When purchasing goods and services, EC must always comply with the company's procurement policies and procedures.
- Immediately report any warning signs that may indicate an inappropriate payment or business relationship to the Legal and Compliance team.
- Immediately report any health, safety, or environmental issues, human rights violations, or issues related to forced labor, slave labor, or child labor to the Legal and Compliance team. Do not put yourself or victims of human rights violations in additional danger by confronting the perpetrators directly.
- Always follow EC reporting procedures to ensure that issues are addressed in a timely and appropriate manner.
- Immediately report to the person/team responsible for legal affairs and regulatory compliance any attempts to pressure you to use a particular supplier or requests to deviate from EC procedures for selecting or managing suppliers.
- Be cautious if a supplier makes unrealistic price or delivery demands or suggests bypassing or expediting government approval procedures (e.g., customs clearance) for goods or services offered by the supplier.
- Do not accept any gifts from a supplier worth more than €50 for yourself or your relatives in exchange for favorable treatment.
- Bribes (payments to a person who has illegally facilitated a transaction) are illegal and contrary to our practices. Report any attempts to offer bribes to the person responsible for legal affairs and regulatory compliance.
- Ensure that suppliers with whom you work or otherwise deal with take prompt and effective action to remedy any deficiencies identified during site visits, inspections, and other audits.
- Ensure that suppliers and their employees, contractors, and temporary workers are aware of Electro Center's reporting channels for raising concerns or complaints.

These guidelines ensure that working with suppliers is responsible, in line with EC's values, and equal for all suppliers. These guidelines are also communicated to suppliers, who are required to comply with the following.

COOPERATION WITH SUPPLIERS

Demands for suppliers

The demands for suppliers disclosed in the EC Electro Center Supplier Code of Conduct.

Developing cooperation with suppliers

EC Electro Center Oy recognizes that close and transparent cooperation with suppliers is essential for achieving environmental and sustainability objectives across the value chain. Supplier cooperation is therefore developed in a structured and progressive manner, focusing on environmental performance, ethical business conduct, and compliance with applicable laws and standards.

As part of this cooperation, EC Electro Center Oy seeks to:

- Integrate environmental and sustainability considerations into procurement practices and supplier relationships
- Encourage suppliers to identify, manage, and reduce environmental impacts related to materials, logistics, and services
- Promote responsible and ethical business conduct throughout the supply chain

To support these objectives, EC Electro Center Oy develops supplier engagement practices that includes:

- Clear communication of environmental and ethical expectations in procurement criteria, contracts, and supplier guidelines
- Dialogue with key suppliers on environmental performance, emissions, and improvement opportunities
- Monitoring supplier compliance with applicable legal, environmental, and ethical requirements

In addition, EC Electro Center Oy supports the development of ethical business practices in the supply chain by offering or facilitating training and awareness-raising activities for suppliers, including courses or guidance on the prevention of corruption and bribery.

These activities aim to:

- Increase supplier awareness of ethical risks related to corruption and bribery
- Support compliance with applicable anti-corruption legislation and good business practices
- Strengthen trust, transparency, and long-term cooperation within the supply chain

The course that EC Electro Center is currently encouraging suppliers to take is the “UN Introduction to Anti-Corruption course”.

The development of supplier cooperation is implemented progressively, taking into account the size, role, and risk profile of suppliers. Progress is reviewed regularly and aligned with EC Electro Center Oy’s overall sustainability, compliance, and responsibility objectives.

MECHANISMS FOR IDENTIFYING AND REPORTING ILLEGAL ACTIVITIES AND ACTIVITIES THAT VIOLATE ETHICAL RULES

Identifying and reporting illegal and unethical behavior is a key part of EC Electro Center's risk management and ethical conduct. EC has clear operating principles on how to prevent and detect corruption, bribery, and illegal and unethical behavior.

Actions to take in unethical and illegal situations

Compliance with workplace rules and ethical guidelines

Electro Center's Code of Conduct, Electro Center's responsible procurement policy, Finnish legislation, and compliance with data protection legislation (GDPR) require EC employees and subcontractors to comply with the same requirements.

Responsibilities

Management and supervisors are responsible for ensuring that the organization's activities comply with ethical rules and legislation. Partners are responsible for ensuring that their own employees and value chain comply with ethical and legal requirements.

Whistleblowing channel

EC Electro Center's whistleblowing channel enables its own employees and external employees to report unethical or illegal activities without fear of losing their privacy or facing retaliation. EC's whistleblowing channel is maintained and monitored by a third party.

Monitoring and development

Third party monitoring

The activities of third parties, such as subcontractors, suppliers, and partners, are monitored as necessary through contractual terms and conditions.

MECHANISMS FOR IDENTIFYING AND REPORTING ILLEGAL ACTIVITIES AND ACTIVITIES THAT VIOLATE ETHICAL RULES

Information systems

Our information systems help us monitor and track the organization's activities, such as financial transactions, customer data, and contracts.

Supervision of supervisors

The activities of supervisors are monitored through staff surveys, HR analytics, and development discussions, as well as by committing them to act in accordance with the company's Code of Conduct through written confirmation

Internal audit and access to information

EC Electro Center may conduct internal audits and reviews to verify compliance with this Code of Conduct, applicable laws, and internal policies. Relevant functions (e.g., Internal Audit, Legal & Compliance, Finance, HR) may request access to information necessary for investigations, audits, or risk management, subject to applicable data protection and confidentiality requirements.

Employees are expected to cooperate honestly and fully with audits and investigations.

All of these mechanisms together create a foundation that supports the organization against illegal or unethical activities. Keeping systems and processes up to date helps reduce risks and ensure that the organization operates responsibly and lawfully.

IMPLEMENTATION OF THIS POLICY

This policy has been approved by the executive committee of EC Electro Center on the following specifics:

Approved: 21.1.2026

Valid: until further notice

Scope of coverage: the entire EC Electro Center Oy and its operations