

Category Approved by Business Supporting Process Anna Turunen

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EG's code of conduct are ethical guidelines for how we behave within the company. These guidelines permeate our entire organization in everything we do, every day.

The purpose is to protect human rights, promote fair and safe working and employment conditions, manage environmental issues, and set high ethical standards.

The Code of Conduct shall be applied in all business activities of all our services worldwide. It describes our intention on how to behave when we do business and how we interact with our stakeholders. Our Code of Conduct shall give guidance and be a governing routine on how an employee shall act in accordance with our Core Values, Passion & Competence.

Hence, we require our suppliers and their subcontractors to adhere to the Code of Conduct or comparable standards to verify compliance by providing information and granting access to their premises.

To make this commitment clear to employees, suppliers, customers, and other stakeholders our Code of Conduct is based on the United Nations Global Compact initiative, an international initiative which is supported by corporations around the world to ensure accountability.

Objectives /Guidelines

1. We make the 10 principles of the Global Compact an integral part of our business strategy.

2. We incorporate the Global Compact and its principles in the decisions making processes of the management group.

Legal Compliance

We shall follow all applicable international, national, and relevant laws and regulations as well as local work environment and labor legislation.

In addition to compliance with all relevant laws, regulations, and standards in all the countries in which we operate, all our units, companies and employees shall comply with the Code of Conduct even if it stipulates a higher standard than required by national laws or regulations.

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Human Rights

Within our sphere of influence, we support and respect the protection of internationally proclaimed Human Rights. We make sure that we are not complicit in human right abuses.

We are all expected to:

- Enable and foster human rights in the sphere of our influence.
- Speak up in case of a suspected human rights violation.
- Perform risked-based due diligence when working with business partners.

Prevention of Forced Labor and Human Trafficking

We must ensure that the supply chain is not complicit of any form of slavery, forced, bonded, indentured, or prison labor. This includes the transportation, harbouring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. All labor must be voluntary, and employees should have the freedom to terminate their employment with reasonable notice. Employees should not be required to surrender any government-issued identification, passports, or work permits as a condition of their employment.

Labor Standards

All employees shall be treated with respect and dignity.

1. Employment is freely chosen

No form of forced or compulsory labor is tolerated.

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2. Freedom of Association and the right to collective bargain

All employees should have the right to join or establish labor unions and other workers' organizations of their choice. It protects individuals from interference or discrimination in exercising this right.

All employees should have the right to collective bargain regarding employment terms and conditions. It involves discussions on wages, working hours, benefits, and other aspects of the employment relationship. The goal is to reach agreements that are mutually acceptable to both parties. It shall protect against acts of interference with the establishment, functioning, or administration of workers' organizations in accordance with applicable laws and regulations.

3. Harassment and antidiscrimination

No employee or potential employee should receive less favourable treatment or consideration about gender, race, religion, age, disability, sexual orientation, colour, nationality, belief or political opinion, union affiliation, marital status, social or ethnic origin. No form of discrimination, harassment or other improper conduct will be tolerated whether committed by or against, leaders, co-workers, customers, vendors, or visitors. This also applies to events that occur outside the physical workplace, or after working hours, such as during business trips, at company events, and on social media. Any claims of discrimination or harassment will be taken seriously and handled promptly.

4. No exploitation of child labour

This is a fundamental aspect of promoting fair and ethical labor practices. <u>Child labor is strictly prohibited</u>. Neither EG or our suppliers should use or support any use of child labor or child exploitation.

Minimum age of employment is the age of completion of compulsory schooling. Children should not be employed for any hazardous work, or work that is inconsistent with the child's personal development. A child means a person below the age of 18 years, as defined in Article 1 of the United Nations Convention on the Rights of the Child. We expect that our suppliers should have age verification procedures implemented.

5. Payment of living wage

Deductions from wages for disciplinary measures shall not be permitted. Deductions shall never constitute an amount that will lead the employee to receive less than the minimum wage.

6. Reasonable hours of work

Hours of work shall comply with applicable laws and industry standards. The total working hours (regular hours plus overtime) should not exceed an average of 48 hours a week during a period of four months.

7. Safe and healthy working conditions

EG shall demonstrate a commitment to creating a workplace culture that prioritizes the well-being and safety of employees, fostering a positive and productive working environment. EG shall clearly state our organization's stance on substance abuse and follow our policy against the use of drugs or alcohol in the workplace. The working environment shall be entirely drug free.

8. Women's rights

We believe that men and women should have equal opportunities for employment, education, and development. Any decisions on recruitment, selection, education, promotion, and career development are based on objective and professional criteria related to the proven performance, the role in question and assessed potential.

We aim for an equal distribution with regards to gender in the workplace when recruiting, and we are actively facilitating for men and women to combine parenting with work.

8. Fair Treatment

We shall commit to a workplace free of harassment. We shall not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, or unreasonable restrictions on entering or exiting company provided facilities. We shall prohibit harassment and unlawful discrimination in the workplace.

Whistle-blower function

EG has a separate whistleblowing policy for reporting irregularities. If an employee or other person would discover possible unethical or unlawful behaviour, their observations should always be reported to nearest manager, HR or through the whistleblowing function. The whistleblower can choose to be totally anonymous.

Environment

We shall routinely audit, follow up and report our environmental footprint. Procedures and standards for waste management, handling of hazardous and dangerous materials must meet or exceed minimum legal requirements. Limited resources shall be used responsibly and carefully. We encourage and promote innovative developments and changes in procedures that could reduce any environmental burden associated with our activities.

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Development and diffusion of environmentally friendly technologies shall be encouraged.

Anti-Corruption

It is important for each individual to adhere to ethical and legal standards in business processes to ensure fair competition and to promote transparency and accountability. To influence the business processes through indirect and/or direct bribery or other provision of sponsorship is illegal and can result in severe legal consequences for both the supplier and EG. No form of extortion and bribery, including improper offers for payments to or from employees, or organizations, is tolerated.

Business Ethics

Deals with business partners are characterized by fairness. We shall not offer customers, potential customers, governments, agencies of governments or any representatives of such entities, any rewards, or benefits in violation of either applicable laws or reasonable and generally accepted business practice.

Employees should not accept payments, gifts, or other kinds of reimbursement from a third party that could affect their objectivity in their business decisions.

Employees representing EG shall act and dress as if they were about to meet an important stakeholder.

EG Ethical rules - Doing business the right way

Follow the law - We respect and obey the laws, rules and regulations that apply to our company. Deliver quality - We are committed to delivering quality products and services. Act with integrity - We neither offer nor accept bribes, inappropriate gifts, or representation. Be passionate - We are passionate about what we do and how we do business. Be competent - Within our area of business, we are competent in everything we do.

Disclosure of Information

We must accurately record and disclose information regarding our business activities, structure, financial situation, and performance in accordance with applicable laws and regulations and prevailing industry practices.

Protection of Intellectual Property

We must respect intellectual property rights and safeguard customer information: transfer of technology and know-how must be done in a manner that protects intellectual property rights.

For further information about the United Nations Global Compact and its 10 principles: http://www.unglobalcompact.org/aboutthegc/thetenprinciples/index.htm