

## Code of Conduct, 2022

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### 1. General

TREON aims to be an attractive and reliable business partner for the benefit of TREON, its customers, partners and suppliers. TREON seeks reliable fair relationships for mutual benefit.

This TREON Code of Conduct ("Code") depicts the values according to which TREON operates globally.

TREON expects and desires all of its partners and suppliers to conform to the policies defined below in their dealings with TREON, their own employees and suppliers, as well as third parties including government officials and others.

TREON requires for its employees, shareholders, partners and suppliers to read and conform to the principles defined below.

### 2. Ethics

#### 2.1 General Requirements

TREON requires all stakeholders to be committed to ethical conduct, full compliance with all applicable national laws and international treaties, and respect for human rights in the spirit of internationally recognized standards.

#### 2.2 Compliance with Laws and Rules of Society

TREON requires all stakeholders to be committed to full compliance with all applicable laws and regulations. These guidelines are not a substitute for, nor should they be considered to override, applicable laws and regulations. They represent supplementary principles and standards of behaviour of a non-legal character.

#### 2.3 Intellectual Property and Publicity

TREON expects all stakeholders to conform to all applicable laws and international treaties on intellectual property and to refrain from infringing on either TREON's or third party's intellectual property rights.

TREON expects its suppliers to comply with all applicable agreements on confidentiality or non-disclosure. Furthermore, stakeholders are entitled to publicize their cooperation with TREON or utilize TREON trademarks only to the extent TREON has expressly given prior written authorization. In the event that such explicit authorization exists, stakeholders are expected to comply with all instructions and guidelines that TREON may from time-to-time issue.

## **2.4 Improper payments or benefits**

No direct or indirect bribes or other payments of any amount; or hospitalities (direct or indirect), such as entertainment or gifts, of an excessive nature shall be made by TREON's partners and suppliers for the benefit of TREON's employees, any governmental representative or employee, labour union, or current or prospective customers or suppliers for the purpose of improperly obtaining benefits of any kind. No stakeholder shall propose nor accept any improper benefit from any source.

## **2.5 Conflict of Interest**

Stakeholders shall avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest while engaged with TREON. A conflict of interest occurs when a representative of a stakeholder seeks to further one's personal interest, or that of a friend or relative, due to one's position as a representative of a stakeholder. Stakeholders are required to report any situations of potential or apparent conflicts between their personal interests and the interests of TREON. TREON requests stakeholders to confirm to TREON that they are not directly or indirectly owned by TREON employees or their immediate family or that such persons have not otherwise any vested interest in the supplier. Stakeholders must immediately disclose in writing any such changes in their ownership should they later occur.

# **3. Environment**

TREON provides safe, environmentally efficient and responsible products, high performance services and solutions. TREON strives for continuous improvement in all of its business activities by following applicable rules and regulations. TREON strives with its suppliers and customers to prevent or reduce emissions and waste related to business operations. TREON expects its suppliers and partners to conform to the same values and more specifically to the principles outlined below:

- (i) Stakeholders shall obtain and maintain all required environmental permits and registrations and shall follow the operational and reporting requirements associated with such permits;
- (ii) Stakeholders shall strive to reduce or eliminate waste of all types;
- (iii) Stakeholders shall monitor, control and appropriately treat wastewater and solid waste generated from operations;
- (iv) Stakeholders shall monitor, control and appropriately treat air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations; and
- (v) Stakeholders shall adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances, as well as those laws and regulations regarding the reporting of an intentional or inadvertent wrongful discharge of waste and emissions.

# **4. Labour**

## **4.1 Non-discrimination**

TREON expects its suppliers and partners to treat their employees in a fair and equal manner. TREON is committed to a policy of equal opportunity that prohibits discrimination of any type.

Diversity is accepted and valued by TREON and the same is expected from TREON suppliers and partners. TREON strongly believes non-discrimination is both an ethical standard and a fundamental human right. TREON will not tolerate discrimination, whether due to race, colour, sex, age, religion, political opinion, national, ethnic origin or any other characteristic protected by law.

## 4.2 Child or Forced Labour

TREON will not accept child or forced Labour under any circumstances or contract with stakeholders using such Labour.

## 4.3 Working Environment

TREON strongly believes all employees are entitled to a safe and healthy working environment and have the right to be free from violations of personal integrity. Any type of harassment, regardless of the intent, whether direct or indirect, physical or verbal, is prohibited. TREON expects its suppliers and partners to ensure all of its employees are allowed to work in a harassment-free environment.

## 4.4 Wages and Benefits

TREON suppliers and partners shall ensure that compensation paid to their employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and mandatory benefits.

# 5. Health and Safety

TREON expects its suppliers and partners to maintain an adequate administrative policy on health and safety ensuring, at minimum, compliance with the following principles:

- (i) Worker exposure to potential safety hazards is to be controlled through proper design, engineering, administrative controls, preventive maintenance and safe work procedures;
- (ii) Emergency situations and events are to be identified and assessed, and their impact minimized, by implementing emergency plans and response procedures;
- (iii) Procedures and systems are to be in place to manage, track and report occupational injury and illness;
- (iv) Worker exposure to chemical, biological and physical agents is to be identified, evaluated and controlled; and
- (v) Worker exposure to physically demanding tasks is to be identified, evaluated and controlled.

# 6. Management System

TREON expects its suppliers and partners to have a management system in place to ensure compliance with applicable laws, regulations and TREON's requirements relating to the suppliers' operations, products and mitigation of operational risks. The management system shall facilitate continuous improvement and as a minimum include the following elements:

- (i) Corporate social and environmental responsibility statements affirming supplier's commitment to compliance and continuous improvement;
- (ii) Clearly identified company representative(s) responsible for ensuring implementation and periodic review of the status of the management systems;
- (iii) Identification, monitoring and understanding of applicable laws, regulations and customer requirements;
- (iv) Process to identify and control the environmental, health and safety and labour practice risks associated with supplier's operations; and
- (v) Periodic self-evaluations to ensure conformity to legal and regulatory requirements, to the content of this Code of Conduct and to customer contractual requirements related to social and environmental responsibility.

## 7. Feedback

When having any questions or concerns concerning the content of this Code of Conduct, please report to: [ethics@treon.fi](mailto:ethics@treon.fi)