

June 2023



Code of Conduct

 HARJU ELEKTER®

Electrifying Tomorrow



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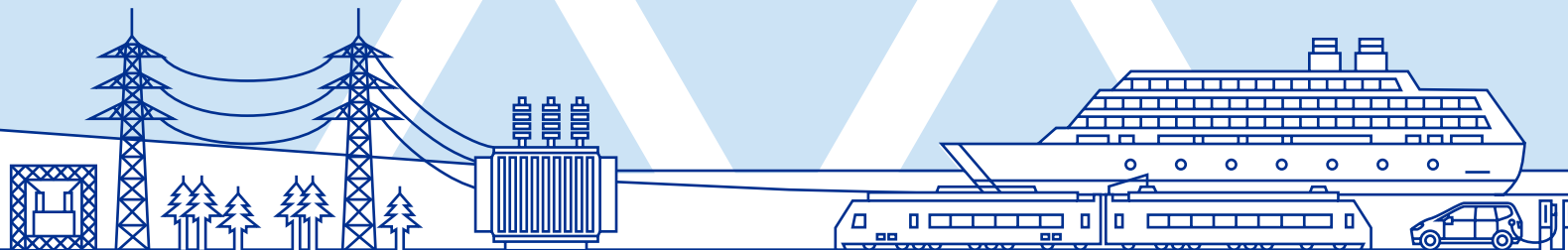
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Mission

Harju Elekter is committed to being an invaluable partner to our customers, contributing to a sustainable society by providing future-proof electrical power distribution solutions.

Vision

To be the most reliable electrical power distribution solutions provider in the Nordic region.



Values



DEVELOPMENT

We are keen to learn and be innovative

We are constantly expanding our know-how to develop advanced products. We value innovative proposals and are ready to implement them.

COOPERATION

We work as one team

We listen to our customers and collaborate with our partners to make products that meet and exceed our customers' expectations as a united international team.

RELIABILITY

No bargaining over quality

It is a great honour for us to make high-quality products. We make use of advanced technology and all our know-how to fulfil orders on time.



A message from the CEO

Harju Elekter's Code of Conduct expresses our values of development, cooperation, and reliability. It serves as a guide for ethical behaviour and decision-making. Our mission is to be an invaluable partner to our customers, contributing to a sustainable society by providing future-proof electrical power distribution solutions. This cannot be achieved without developing our people and know-how, fostering successful cooperation with our customers and each other, and upholding reliability as the foundation.

As members of this organisation, it is vital that each of us understands and adheres to our Code of Conduct in every situation they face. Our principles are integrated into our management system to ensure their implementation throughout our organisation.

We take our commitment to ethical behavior seriously and are dedicated to updating and reviewing our

Code of Conduct to ensure its ongoing relevance and effectiveness. Harju Elekter's management team is fully committed to upholding and promoting the principles outlined in our Code of Conduct. We actively encourage a culture of accountability and expect all members of our organisation to embrace these principles in their daily activities.

Our Code of Conduct mandates that we conduct all our dealings with fairness, honesty, and respectfulness. We are committed to complying with all relevant laws and regulations, adopting safe and healthy work routines, and respecting human rights. If you suspect that a violation of the Code has occurred, you should promptly report it.

We are the shapers of Harju Elekter's culture and therefore we must all strive to promote ethical behaviour and hold ourselves and each other accountable for our actions. Let's all familiarise ourselves with our Code of Conduct and live and lead according to our values of development, cooperation, and reliability.

Yours sincerely,
TIIT ATSO
 CEO

The role of our Code of Conduct

Harju Elekter views its Code of Conduct as a vital guide for conducting business that applies to all employees and managers. It is also expected that our key stakeholders adhere to the similar principles stated in the Code of Conduct. We believe that by

working together with our stakeholders to uphold these principles, we can create a culture of ethical behaviour and build long-lasting relationships based on trust and mutual respect.

Code of Conduct serves to establish standards and expectations, empowering us to stand up for our beliefs and speak out when something seems amiss or when we have ideas for improvement. Additionally, it provides a framework to aid in our decision-making and points us towards where we can seek assistance when we are uncertain or have questions.

Speak up

At Harju Elekter, we take compliance with our Code of Conduct and other obligations seriously. Each employee has the responsibility to report concerns, suspicions, and observations of any violations of our ethical standards or other obligations.

We encourage open and honest communication, and we have established a number of channels for reporting potential violations. If you are unsure how to proceed, we recommend discussing the situation with your manager or using our whistleblowing portal.

Our whistleblowing portal is available on the intranet homepage and on the [company website](#), and it offers a secure and anonymous way to report any concerns you may have.

By speaking up and reporting any concerns or suspicions, you are helping to uphold our ethical standards and protect the reputation of our company. Your contributions to maintaining a culture of integrity are greatly appreciated.



WE CONDUCT ETHICAL BUSINESS PRACTICES

Anti-corruption, bribery and gifts

We at Harju Elekter do not tolerate any form of corruption in our business dealings and maintain a zero-tolerance policy towards bribery and expect the same from our business partners.

Corruption is the abuse of entrusted power for private gain, whether it is financial or non-financial. Bribery involves the exchange or offer of something of value to improperly influence a business decision or gain an unfair advantage. This includes but is not limited to gift cards, cash, entertainment, inappropriate discounts, or donations.

Gifts must be directly related to legitimate business goals, reasonable in value, and appropriate for the occasion. Cash or cash equivalents such as gift cards are not allowed. Gifts should also be infrequent and given with the intention of building a positive business relationship rather than influencing business decisions.

Sponsorships, donations, and charitable contributions at Harju Elekter are required to align with the company's legitimate objectives and must not serve any unethical purposes. We prohibit any form of contribution to political parties, politicians, or related institutions. We maintain a strict stance of neutrality and do not engage in any activities that may be perceived as favoritism or political influence.

We have established clear guidelines and approval requirements for accepting or offering gifts to maintain transparency:

Value	Approval requirements
€50 or less	No approval required provided it meets the general principles
Between €50 and €150	Written pre-approval from your manager
€150 or more (or a total value of €500 or more in any calendar year)	Written pre-approval from your manager and legal department

We take any allegation of bribery or corrupt activities seriously and will investigate thoroughly.

As employees of Harju Elekter, we adhere to the following principles:

- We do not offer, give, demand, or accept a bribe or any other form of benefit in any situation.
- We do not accept gifts that violate applicable law or that could influence business decisions.
- We report any situations where there may be potential violation of our Code of Conduct.

EXAMPLES:

- **Q: If a customer contacts me and requests to discuss contract details outside of working hours and alone, what actions should I take?**
A: Avoid meeting at inappropriate locations that could compromise integrity and lead to bribery. Politely decline the request and suggest an alternate time or location during work hours. If the customer keeps insisting, inform your manager.
- **Q: A supplier has offered me tickets to a sold-out concert. What should I do?**
A: If you are uncertain about the appropriateness of accepting the gift, or if you are unsure whether it is too expensive or could be considered a bribe, you should contact your manager to seek guidance.
- **Q: A supplier participating in my company's ongoing tender for machines offers a free trip abroad. What should I do?**
A: Accepting any gifts or benefits from suppliers during an ongoing tender process is generally considered unethical and could potentially be interpreted as a form of bribery. You should politely decline the offer.

Conflicts of interest

At Harju Elekter, we expect our employees to act in the best interest of the company and not pursue personal interests that conflict with their obligations to the company. All decisions made at Harju Elekter must be in the best interests of the company, regardless of the situation.

Examples of potential conflicts of interest include:

- Personal relationships: hiring or supervising friends or family members or allowing a family member to receive improper personal benefits due to our position within Harju Elekter.
- Financial interests: having a financial interest in a competitor, customer, or supplier of Harju Elekter.
- Outside activity: allowing a second job to detract from our responsibilities in Harju Elekter, which may risk the quality of our work.
- Business opportunities: taking an opportunity we learned about through our work at Harju Elekter for ourselves or starting a business that competes with Harju Elekter.

As employees of Harju Elekter, we adhere to the following principles:

- We use Harju Elekter's property and information only for legitimate business purposes.
- We do not compete with Harju Elekter or take advantage of the company's business opportunities.
- We do not let any outside associations or involvement with other organisations compromise our commitment to fulfilling our responsibilities for Harju Elekter or compromise the quality or quantity of our work.
- We disclose any possible conflict between our work and private interests.

EXAMPLES:

- **Q: What should I do when one of my employees has a second job (night shift) and it affects their performance at our company?**
A: If you notice that the employee's quality of work or productivity is suffering due to their night shift job, you should have a conversation with the employee to discuss the issue and explore potential solutions. The employee may need to reduce their hours at their other job or end their employment there if it continues to affect their performance.
- **Q: What should I do if one of my employees, who is also my relative, requests special treatment such as coming to work later due to personal reasons?**
A: You should handle this situation with professionalism and treat your relative like any other employee. Consider whether the requested change in schedule will interfere with the employee's ability to perform their job duties and how it may impact other employees. If you feel uncomfortable making the decision yourself, seek advice from a higher-level manager or HR Manager.
- **Q: I need to book a hotel for a team-building event, and I am considering a hotel where my good friend is one of the owners. Although the price is better compared to other hotels, I am concerned about the potential conflict of interest. What should I do?**
A: It would be best to recuse yourself from making the decision to book the hotel and delegate the responsibility to someone else. If this is not possible, you should disclose the conflict of interest to your manager and seek guidance on how to proceed.
- **Q: If I invite a supplier to a restaurant and bring my spouse, should the company pay for my spouse's meal?**
A: No, you should pay for your spouse's meal yourself. The company should only pay for expenses related to business purposes. Bringing a spouse or other non-business guest to a business meal is generally not considered a legitimate business expense.

Confidential information and inside trading

We at Harju Elekter recognise the importance of keeping inside information confidential. Inside information refers to material, non-public information that we have access to through our work, and which is not yet generally known by the public, and is either owned by Harju Elekter or its subsidiary or a third party. Examples of inside information include non-public information about mergers or acquisitions, sales or earnings results, financial forecasts, changes to the executive management team, pending material lawsuits, or major business wins or losses.

We strictly prohibit the use of inside information for personal gain, which is illegal. Passing inside or confidential information to family members, friends, or a third party, or spreading false rumours is also prohibited and is illegal. If you are uncertain about whether you possess inside information, please contact the legal department.

The unauthorised release of confidential information can cause us to lose our competitive advantage, embarrass us and damage our relationships with our customers and business partners.

As employees of Harju Elekter, we adhere to the following principles:

- We ensure that confidential information is always secure, and we never leave it where others can see or access it. We do not post and share any company related information (for example computer screens, images, documents, information heard on meetings or from colleagues) publicly, including in social media.
- We store confidential or sensitive information only on approved devices.
- We never discuss confidential matters in public.
- We dispose of all confidential information according to the company's policy to ensure proper and secure destruction.

EXAMPLES:

- **Q: As an insider employee of a company, what should I do if a friend who is also an investor of the company asks for information that might be confidential?**
A: As an insider employee, it is important to protect confidential information to avoid any accusations of insider trading. You should politely decline to share any information and explain that you are not authorised to discuss the company's performance or any confidential matters.
- **Q: What should I do if I accidentally receive an e-mail with confidential information intended for someone else in the company?**
A: You should immediately notify the sender and delete the e-mail from received folder (generally Inbox) and from Deleted items in your mailbox without sharing or discussing the contents with anyone else.
- **Q: I have an upcoming meeting where confidential information will be shared, but my headphone battery is dead, and I would need to use speakers instead. What should I do to protect the confidentiality of the information?**
A: You should try to find a private location where you can participate in the meeting without risking the confidentiality of the information. It's important for employees to take confidentiality seriously and take steps to protect sensitive information, even if it means temporarily leaving a meeting or finding alternative means of communication.
- **Q: Is it ethical for me to inform my relative to buy my company's stock based on insider information that I have, which suggests that the company is going to expand which increase the value of the stock?**
A: No, you cannot share insider information with anyone outside the company, including family members or friends, as it constitutes insider trading.

Fair competition and protection of intellectual property

At Harju Elekter, we are committed to fair and open markets and fully comply with all competition and antitrust laws that apply to our business activities. Fair competition refers to the practice of conducting business in an open and transparent manner, free from any form of deception or manipulation.

We market and sell our products and services honestly and fairly based on their qualities, capabilities, costs, and prevailing market conditions.

Harju Elekter respects the intellectual property rights of others and ensures that its own intellectual property is properly protected.

As employees of Harju Elekter, we adhere to the following principles:

- We do not discuss sensitive topics, such as prices, contract terms, marketing plans, or any other confidential information with our competitors or other external stakeholders. We do not obtain competitive information through illegal means.
- We do not cooperate with any organisations engaged in anti-competitive activities, such as price fixing, market allocation schemes, or abuse of market power. We do not tolerate such practices from our suppliers, customers, or any other partners.
- We respect the intellectual property rights of others, including copyrights, patents, trademarks, and trade secrets, and only act within the limits of granted licenses.

EXAMPLES:

- **Q: A new employee who used to work for our competitor has offered to show me some drawings from their previous job to help with a project. Is it ethical to accept this offer?**

A: No, it is not ethical to accept this offer as it could be considered unfair competition. The drawings could contain confidential or proprietary information belonging to the competitor, and by using this information, it could give our company an unfair advantage over the competitor.

- **Q: What steps can I take to ensure compliance with intellectual property laws when dealing with customer drawings using a student version of software on my personal computer while working from home?**

A: You should only use a computer provided by your employer. This way, you can be certain that the necessary software licenses are valid and that all work is being done legally and ethically.

Information security and data privacy

At Harju Elekter, we are committed to ensuring the security of our information and technology, as well as safeguarding personal data and company assets. We recognise the importance of protecting our data, systems, and networks from unauthorised access, theft, and damage.

We are responsible for maintaining the security of the information we handle, including personal data. Personal data refers to any information that can identify a natural person or is associated with an identified person. We handle the collection, usage, storage, transfer, and disclosure of personal data in accordance with relevant laws, and we expect our suppliers and business partners to do the same.

As employees of Harju Elekter, we adhere to the following principles:

- We do not install unapproved software or hardware, use unauthorised devices on our network, access suspicious websites, share personalised accounts passwords or access codes, or open suspicious e-mails.
- We comply with applicable data protection legislation when processing personal data of our employees and other individuals with whom we do business, including customers, partners, and other stakeholders.
- We always respect the right to privacy of our employees when collecting, storing, or monitoring their personal information.

EXAMPLES:

- **Q: I received an e-mail from an unknown sender asking for my personal information. What should I do?**

A: Do not reply to the e-mail or provide any personal information. You should report the incident immediately through “Report Message” functionality in your work mailbox or to IT department.

- **Q: I want to use a personal device to access company data. What should I do to ensure data privacy?**

A: Personal devices are generally not allowed to access company data. Request exception based on your business need from your manager and check with the IT department what measures need to be taken to ensure data privacy.

- **Q: My phone/computer was stolen, and it contained company data. What should I do?**

A: You should immediately notify your manager and the IT department. Provide them with information on when and where the theft occurred, which device was stolen, and what specific company data was stored on the phone or computer. It’s important to act quickly to minimise any potential damage or breaches of confidentiality.

- **Q: I have a job interview with a candidate, and I would like to gather opinions from my colleagues. Can I send the candidate’s CV to other colleagues for their input?**

A: When it comes to handling candidate information and sharing CVs, it is important to respect privacy and adhere to data protection regulations (such as GDPR). Follow these key steps: obtain consent, limit access, secure transmission, remind of confidentiality and follow data retention rules.

Asset protection

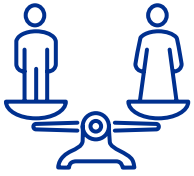
We recognise the importance of safeguarding company assets, which consist of the tools and information we use in our daily work. We use our assets only for legitimate business purposes and handle them with care.

As employees of Harju Elekter, we adhere to the following principles:

- We protect company assets to ensure that they are not lost, damaged, misused, or wasted, and we do not loan, transfer, sell, or donate them without proper authorisation.
- Company assets and networks are not to be used for personal purposes. However, limited use of communication tools such as public e-mail services (for example Gmail, Hotmail), telephone, and the internet may be acceptable, as long as it does not result in unreasonable costs, it is used with care, and it does not hinder our job responsibilities.

EXAMPLES:

- **Q: It's springtime and I would like to take some production gloves home to use for gardening. Is this okay?**
A: No, it's not okay to take company assets home without permission. Company assets are intended for business use only. You should speak to your supervisor and ask for permission to use the gloves for personal use outside of the workplace.
- **Q: I accidentally spilled coffee on my company laptop. What should I do?**
A: You should report any damage to company assets as soon as possible. You should inform your manager and IT department immediately and follow their instructions for repair or replacement of the laptop.
- **Q: What should I do if I notice a scratch on the company car while using it?**
A: If you notice a scratch on the company car while using it, it is important to take appropriate action. You should immediately report the incident to your supervisor or the designated department responsible for managing company vehicles.



WE RESPECT HUMAN RIGHTS AND LABOR PRACTICES

Health & Safety of employees

We prioritise the safety and well-being of our employees and are committed to meeting all applicable legal requirements, and we expect the same from our partners.

We provide a healthy and safe environment for our employees, co-workers, and contractors, and continuously improve our health and safety management systems and practices.

We follow [Occupational Health and Safety Policy principles](#).

As employees of Harju Elekter, we adhere to the following principles:

- We prioritise the safety and health of ourselves and others in the workplace, and take all reasonable precautions to maintain a safe environment.
- We are mindful of our actions and ensure that we do not put ourselves or others at risk.
- We must be knowledgeable of emergency procedures and act swiftly and appropriately in the event of an emergency.
- We report hazards, incidents, or accidents immediately to ensure prompt resolution and prevention of future occurrences.

EXAMPLES:

- **Q: If I identify a hazard in my workplace, what are the appropriate steps I should take to ensure the safety and health of myself and my co-workers?**
A: You should immediately report the hazard to your supervisor or to the Health and Safety Specialist in your workplace. It's important to take steps to mitigate the risk of injury or illness for yourself and your colleagues. By reporting the hazard, you are contributing to a safe and healthy workplace for everyone.
- **Q: I noticed that a customer visiting our factory is not wearing appropriate protective gear and is wearing open-toe shoes. What actions should I take?**
A: You can politely approach the customer and explain the safety requirements, including the risks associated with not wearing the appropriate gear. If the customer fails to comply, it is essential to escalate the matter to your manager or Health and Safety Specialist for further assistance.

Diversity, inclusion, and non-discrimination

At Harju Elekter, we value diversity and recognise that a diverse and inclusive workplace is essential for our success.

We are committed to creating an environment where all employees feel valued and respected, and we encourage everyone to contribute their unique skills and perspectives to our business operations.

Any form of bullying is strictly prohibited, and we maintain a zero-tolerance policy towards workplace violence, including threats, harassment, assaults, and any other similar conduct.

In our recruitment process, we make decisions based on relevant qualifications, performance, merit, and other job-related factors.

As employees of Harju Elekter, we adhere to the following principles:

- We do not engage in or tolerate any form of workplace bullying, sexual harassment, and discrimination based on skin colour, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual identity and orientation, marital status, religious conviction, or age.
- We ensure that our workplace is inclusive and respectful and provide equal opportunities and treatment to all employees and candidates, regardless of their personal characteristics.

EXAMPLES:

- **Q: If a co-worker makes inappropriate comments and sends me offensive videos, what steps should I take to address the situation?**

A: You should immediately report the behaviour to your manager or HR department. By reporting the behaviour, you can protect yourself and also help ensure that the company takes appropriate action to address the issue and prevent it from happening to others.

- **Q: My co-worker is from a different cultural background, and I feel like he/she is often excluded from team activities and conversations. What can I do to promote inclusivity and diversity in the workplace?**

A: You can try to include your co-worker in team activities and conversations and encourage others to do the same.

- **Q: The behaviour of one of the managers is negatively impacting the morale of the entire team due to their tendency to intimidate and humiliate people. What actions can be taken to address this issue?**

A: You should document specific incidents of the manager's behaviour and how it has impacted you and others. Then, you should bring your concerns to HR or another designated person within your company who is responsible for handling workplace harassment and discrimination issues. They can investigate the situation and take appropriate action to address the behaviour.

Human rights

We are committed to conducting our business operations in a manner that upholds the dignity and rights of all individuals within our operations and supply chain.

We fully endorse internationally recognised human rights principles and support the International Labour Organization's Declaration (ILO) on Fundamental Principles and Rights at Work.

We hold high regard for the rights related to freedom of association, collective representation, fair compensation, equal treatment, and safe and healthy workplaces.

As employees of Harju Elekter, we adhere to the following principles:

- We respect and expect our suppliers to respect rights related to fair wages, safe and healthy workplaces, freedom of association, and collective representation.
- We do not tolerate any kind of forced labour, child labour, or human trafficking in our business dealings or within our supply chain.
- We make reasonable efforts to avoid using raw materials which originate from Conflict-Affected and High-Risk Areas and contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.
- We report possible violations of the principles of this Code of Conduct.

EXAMPLES:

- **Q: I came across a news article that reported a potential supplier, who my co-worker is considering for an upcoming project, has a history of using child labour. Although I am not involved in the decision-making process, I am concerned about the supplier's practices. Should I voice my concerns to my co-worker?**

A: Yes, it is your place to speak up and report your concerns to the appropriate person in your company, such as your manager. Child labour is a violation of human rights, and it is important to take action to prevent it.



WE ARE COMMITTED TO TAKING CARE OF THE ENVIRONMENT

At Harju Elekter we contribute to sustainable future and emission reduction through developing efficient and durable products and solutions.

We are committed towards decreasing our carbon footprint and implementing circular economy principles throughout our supply chain to fight resource scarcity.

We follow [Environmental Policy principles](#).

As employees of Harju Elekter, we adhere to the following principles:

- We conduct regular audits to evaluate and mitigate our environmental impact and risks.
- We comply with respective legislation, regulations, and other applicable requirements.
- We strive to minimize our consumption of materials, energy, and water in our operations, and we promote the re-use and recycling of materials where feasible and safe.

EXAMPLES:

- **Q: I noticed that one of my colleagues throws away cardboard boxes instead of recycling. What should I do?**

A: It is important to promote a culture of environmental responsibility in the workplace to ensure the protection and preservation of our planet for future generations. You should politely inform your colleague about the importance of recycling and the negative impact of not recycling. You can also provide instructions on how to properly recycle cardboard boxes.

- **Q: I noticed that one of the toilets in our facility is broken and water is running. What should I do?**

A: You should report the issue immediately to the real estate department so they can repair the toilet promptly.



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