

July 2025

# Supplier Code of Conduct



# Contents

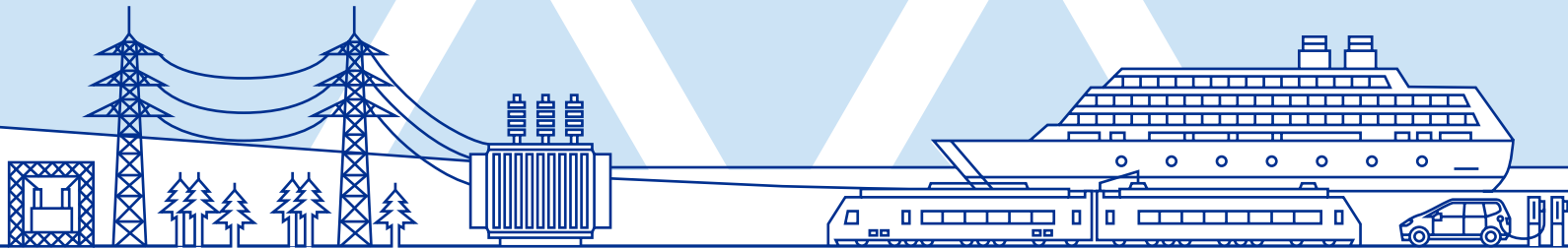
Mission, Vision and Values	3
A message from the CEO	4
The role of our Code of Conduct	5
Speak up	5
Anti-Corruption, Bribery and Gifts	6
Conflict of Interest	6
Conflict-Affected and High-Risk Areas	7
High-Risk Minerals	7
Respect for Human Rights in Our Supply Chain	8
Diversity, Inclusion, and Respect in the Workplace	9
Commitment to Environmental Responsibility	9
Asset Protection and Responsible Use	10
Information Security and Data Privacy	10
Fair Competition and Intellectual Property Protection	11
Health and Safety Commitment	11

## Mission

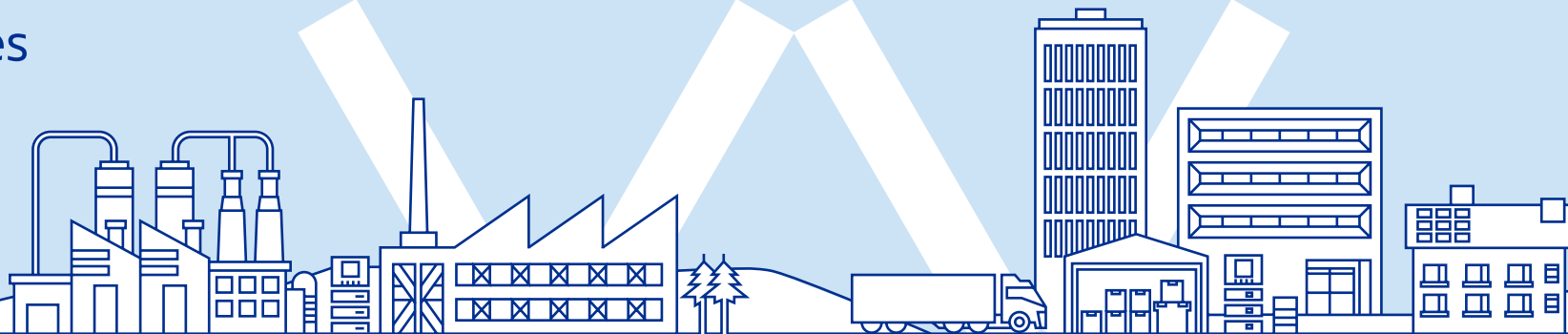
Harju Elekter is committed to being an invaluable partner to our customers, contributing to a sustainable society by providing future-proof electrical power distribution solutions.

## 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

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At Harju Elekter, our **Code of Conduct** reflects the core values that guide our business: **development, cooperation, and reliability**. These principles are not only central to how we operate internally but also to how we engage with our external partners, including our trusted suppliers.

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Our mission is to be a reliable and forward-thinking partner, contributing to a sustainable society through innovative electrical power distribution solutions. Achieving this mission depends on strong collaboration, continuous development of expertise, and a shared commitment to ethical conduct.

We believe that ethical business practices are the foundation of long-term success. That's why we expect all our suppliers to understand and align with the principles outlined in our Code of Conduct. These include:

- Acting with fairness, honesty, and respect in all business dealings,
- Complying with all applicable laws and regulations,

- Supporting safe and healthy working conditions,
- Respecting human rights
- Promoting accountability and transparency.

Our Code of Conduct is integrated into our management systems and is regularly reviewed to ensure it remains relevant and effective. Harju Elekter's leadership is fully committed to upholding these standards and fostering a culture of integrity across our value chain.

If you ever become aware of a potential violation of our Code, we encourage you to report it promptly. We value open communication and are committed to addressing concerns responsibly.

By working in alignment with our values of development, cooperation, and reliability, we can build a partnership based on trust and shared success.

*Thank you for being a part of our journey.*

**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. We expect that our key stakeholders will 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 behavior and build long-lasting relationships based on trust and mutual respect.

The 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 of us 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.

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.



# Anti-Corruption, Bribery and Gifts

At Harju Elekter, we are committed to conducting business with integrity and transparency. We have a **zero-tolerance policy towards corruption and bribery**, and we expect the same high standards from all our suppliers and business partners.

**Corruption** is defined as the misuse of entrusted power for personal gain—whether financial or otherwise. **Bribery** includes offering, giving, receiving, or soliciting anything of value to improperly influence a business decision or gain an unfair advantage. This may include, but is not limited to, cash, gift cards, entertainment, excessive discounts, or donations.

**Cash or cash equivalents**, such as gift cards, are strictly prohibited. We do not support or contribute to political parties, politicians, or related institutions, and we maintain a strict policy of political neutrality.

We appreciate your cooperation in upholding these principles and ensuring ethical business practices in all interactions with Harju Elekter.

# Conflict of Interest

At Harju Elekter, we are committed to making decisions that serve the best interests of the company. We expect the same level of integrity from our suppliers and business partners. Any actions or relationships that could compromise objective decision-making or create a conflict between personal and professional interests must be avoided.

**A conflict of interest** arises when personal interests interfere – or appear to interfere – with the ability to act in the best interests of Harju Elekter.

**We expect our suppliers to follow the following principles:**

- Use Harju Elekter's property, information, and opportunities only for legitimate business purposes.
- Avoid competing with Harju Elekter or misusing business opportunities intended for the company.
- Ensure that any external affiliations or activities do not compromise the quality or integrity of work performed for Harju Elekter.
- Promptly disclose any actual or potential conflicts of interest.

By working together transparently and ethically, we can maintain a strong, trust-based partnership.

# Conflict-Affected and High-Risk Areas

At Harju Elekter, we are committed to responsible business practices, even in complex environments. We expect our suppliers and partners to act with heightened awareness and integrity when operating in or sourcing from conflict-affected or high-risk areas.

**We ask our suppliers to adhere to the following principles:**

- **Assess** whether any part of their operations or supply chains are located in conflict-affected or high-risk areas.
- **Implement enhanced** due diligence measures suited to the specific context.
- **Avoid any direct or indirect** support to armed groups through business activities.
- **Respect the rights** of human rights and environmental defenders, including freedom of expression, association, and peaceful assembly.
- **Refrain from actions** that undermine civil society or civic freedoms.

By upholding these principles, we can help prevent harm and promote stability in vulnerable regions.

# High-Risk Minerals

Harju Elekter is committed to ethical sourcing and expects transparency and accountability throughout the supply chain. The use of high-risk minerals must be carefully managed to avoid contributing to conflict or human rights abuses.

**We ask our suppliers to adhere to the following principles:**

- **Identify the presence of high-risk minerals** in their supply chains and ensure traceability to the source or processing location.
- **Implement appropriate risk** prevention, mitigation, and remediation measures.
- **Share relevant information on the origin of minerals** and due diligence efforts upon request.
- **Publicly disclose** due diligence practices where possible.
- **Seek to reduce or replace** the use of high-risk minerals when feasible.

Together, we can support responsible sourcing and contribute to more sustainable global supply chains.

# Respect for Human Rights in Our Supply Chain

At Harju Elekter, we are firmly committed to conducting our business in a way that respects and upholds the dignity and rights of every individual involved in our operations and supply chain.

We fully support internationally recognized human rights standards, including the principles outlined in the **International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work**.

**We expect our suppliers to share this commitment and to uphold the following key principles:**

- **Freedom of association** and the right to collective representation
- **Fair compensation** that meets or exceeds legal and industry standards
- **Equal treatment** and non-discrimination in all aspects of employment,
- **Safe and healthy working conditions** that protect the well-being of all workers

By aligning these principles, we can work together to build a responsible, ethical, and sustainable supply chain.

At Harju Elekter, we are committed to upholding the highest standards of human rights and labor practices, and we expect the same from our suppliers.

**We expect all our suppliers to respect the following principles:**

- Fair wages, safe and healthy working conditions, and the rights to **freedom of association and collective representation**.
- A **zero-tolerance policy** toward any form of **forced labor, child labor, or human trafficking** in any part of our operations or supply chain.
- Responsible sourcing practices, including efforts to **avoid raw materials** that originate from **Conflict-Affected and High-Risk Areas** and that may contribute to human rights abuses, corruption, or the financing of armed groups.

We also encourage suppliers to report any suspected violations of these principles. Transparency and accountability are essential to maintaining a responsible and ethical supply chain.



# Diversity, Inclusion, and Respect in the Workplace

At Harju Elekter, we believe that **diversity and inclusion** are essential to our success. We are committed to fostering a work environment where all individuals are **valued, respected**, and empowered to contribute their unique skills and perspectives.

**We expect our suppliers and partners to uphold the following principles:**

- **Zero tolerance for bullying or workplace violence**, including threats, harassment, assaults, or any similar conduct.
- **Fair and inclusive recruitment practices**, where decisions are based on qualifications, performance, merit, and other job-related factors.
- **Equal treatment and non-discrimination**, regardless of skin colour, race, nationality, ethnicity, political affiliation, social background, disability, gender, sexual identity or orientation, marital status, religious beliefs, or age.

We encourage all our partners to create and maintain **inclusive, respectful workplaces** that provide equal opportunities for all individuals.

By working together with mutual respect and fairness, we can build stronger, more innovative, and more resilient partnerships.

# Commitment to Environmental Responsibility

At Harju Elekter, we are dedicated to contributing to a sustainable future and reducing emissions by developing **efficient, durable products and solutions**. We are actively working to **decrease our carbon footprint** and implement **circular economic principles** across our supply chain to address resource scarcity.

We expect our suppliers to support and align with our environmental values and practices, which are guided by our Environmental Policy.

**Key principles we follow—and encourage our suppliers to adopt—include:**

- Conducting **regular audits** to assess and reduce environmental impacts and risks.
- **Complying with all applicable environmental laws, regulations, and standards.**
- Striving to **minimize the use of materials, energy, and water** in operations.
- Promoting the **reuse and recycling of materials** wherever feasible and safe.

By working together, we can build a more sustainable supply chain and contribute to a healthier planet.

# Asset Protection and Responsible Use

At Harju Elekter, we recognize the importance of protecting our assets—both physical and digital—as they are essential to our daily operations and long-term success. We expect our suppliers and partners to treat company assets with the same level of care and responsibility.

**We expect our suppliers to observe the following principles when interacting with Harju Elekter's property or systems:**

- **Use company assets only for legitimate business purposes** and handle them with care to prevent loss, damage, misuse, or waste.
- **Do not loan, transfer, sell, or donate** Harju Elekter's assets without proper authorization.
- **Company networks and systems** must not be used for personal purposes. Limited personal use of communication tools (e.g., email, phone, internet) may be acceptable if it:
  - Does not incur unreasonable costs,
  - It is used responsibly, and
  - Does not interfere with business responsibilities.

By respecting these guidelines, we can ensure the security, efficiency, and integrity of our operations and maintain a trusted partnership.

# Information Security and Data Privacy

At Harju Elekter, we are committed to protecting the security of our information, technology, and personal data. We recognize the importance of safeguarding our systems and networks from unauthorized access, theft, and damage—and we expect our suppliers and partners to uphold the same standards.

**We ask our suppliers to adhere to the following principles:**

- **Protect all information and data** shared in the course of business with Harju Elekter, including personal data and confidential company information.
- **Handle personal data responsibly**, in compliance with applicable data protection laws. Personal data includes any information that can identify an individual or is linked to an identifiable person.
- **Ensure secure handling** of data during collection, use, storage, transfer, and disclosure.
- **Avoid using unauthorized software, hardware, or devices** on networks connected to Harju Elekter systems.
- **Do not share passwords, access codes, or open suspicious emails or links** that could compromise information security.
- **Respect the privacy rights** of individuals when processing personal data, including employees, customers, and partners.

By working together to maintain strong information security and data privacy practices, we can protect our shared interests and build a foundation of trust.

# Fair Competition and Intellectual Property Protection

At Harju Elekter, we are committed to operating in **fair, open, and competitive markets**. We fully comply with all applicable **competition and antitrust laws**, and we expect our suppliers and partners to do the same.

**Fair competition** means conducting business transparently and ethically—without deception, manipulation, or anti-competitive behavior. We market and sell our products and services based on their quality, performance, and value, not through unfair practices.

We also place high importance on **intellectual property (IP) rights**. Harju Elekter respects the IP of others and takes appropriate measures to protect its own.

**We expect our suppliers to adhere to the following principles:**

- **Do not engage in discussions or agreements** with competitors regarding prices, contract terms, market strategies, or other confidential or sensitive information.
- **Avoid any involvement in anti-competitive practices**, such as price fixing, market sharing, or abuse of market dominance.
- **Respect intellectual property rights**, including copyrights, patents, trademarks, and trade secrets. Only use IP within the scope of authorized licenses or agreements.
- **Do not obtain competitive information through illegal or unethical means.**

By upholding these standards, we can maintain a level playing field and foster innovation, trust, and long-term success across our supply chain.

# Health and Safety Commitment

At Harju Elekter, the **health, safety, and well-being** of our employees, contractors, and partners is a top priority. We are committed to providing a safe and healthy working environment and expect our suppliers and business partners to uphold the same standards.

We comply with all applicable health and safety laws and continuously improve our **Occupational Health and Safety (OHS) management systems** and practices.

**We expect our suppliers to align with the following principles:**

- **Prioritize the safety and health** of all individuals in the workplace by taking reasonable precautions to prevent accidents and injuries.
- **Act responsibly and mindfully** to avoid putting themselves or others at risk.
- **Be familiar with emergency procedures** and respond quickly and appropriately in the event of an incident.
- **Report hazards, incidents, or accidents immediately** to ensure timely resolution and prevent recurrence.

By working together to maintain high safety standards, we can ensure a secure and productive environment for everyone involved in our operations.



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