

# **CODE OF CONDUCT**

## **GROUP DIRECTIVE**

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Group Management

Directive, policy & guidelines

## **CODE OF CONDUCT**

### Introduction

Our Code of Conduct summarises essential rules and principles that guide our business decisions and behaviour. It defines how we should act towards each other, our customers, business partners, suppliers, competitors, authorities, and in every situation where you may represent HAKI Safety.

The Code is based on the ten principles of the UN Global Compact, the general concepts expressed in the International Labour Organization (ILO) conventions, the OECD Guidelines for Multinational Enterprises and the UN Declaration of Human Rights.

### Employees,

You are responsible for reading the Code of Conduct and understanding and applying the principles in your daily work. When in doubt, ask for help. Your immediate manager should be the first point of contact. Possible or actual violations of the Code of Conduct should be reported to your manager or by using our whistleblower reporting service.

### Managers,

As a manager, you should ensure the employees reporting to you understand the Code of Conduct. Promote a culture of speaking up. Promote ethical and compliant behaviour. Raise awareness of how to report violations. Lead by example and be a role model by displaying ethical behaviour. Always investigate or escalate perceived or actual breaches of the Code. Never try to hide a problem.

### Suppliers and business partners,

At HAKI Safety, we are committed to upholding high standards of ethics in all our business interactions, which means that we expect the same from our suppliers and business partners. We welcome that you report perceived violations of the Code of Conduct.

Chairman of the Board

President and CEO

Approved and updated in April 2025

### Our Code of Conduct applies also to our suppliers and business partners

HAKI Safety expects our suppliers and business partners to adhere to the principles in our Code of Conduct.

We require that suppliers and business partners follow legal and human rights requirements and actively work to reduce negative environmental and health impacts from processes, services, and products. We also encourage suppliers and business partners to implement certifiable management systems for quality, environment and occupational health and safety.

We continuously assess our suppliers and where applicable business partners from an environmental, social and governance perspective. If a supplier is found to be non-compliant, we expect corrective measures. Serious non-compliance eventually leads to the termination of the relationship.

### Use our whistleblower reporting service

We maintain a healthy and open culture where each employee is responsible for complying with applicable regulations and acting ethically. We believe that most situations can be resolved through open and honest communication. However, there may be instances where a different approach is required.

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Regardless of the situation, any problems or more serious issues must be brought to light so that we, as a company, can take appropriate action. You should report promptly in cases where there is a danger to health and life or various types of misconduct.

You play a vital role as an employee, supplier or business partner. That is why we have a whistleblower reporting service which allows you to report any concerns to an external and independent adviser. You can choose to remain anonymous if you wish.

Read more: Whistleblower Directive and www.hakisafety.com/about-us/whistleblowing

### **Disciplinary actions**

If an employee violates the Code of Conduct, disciplinary action will be taken, including possibly terminating employment. If any of our suppliers or business partners violate the Code, we consider this a reason to possibly terminate our business relationship.

### Our Core Values are our Corporate Culture

Our corporate core values are the guiding principles that shape our company's culture, behaviour, and decisions. These values define our organisation's identity, purpose, and direction.

#### It all starts with trust.

We believe that people can achieve great things. We rely on each other, keep our promises and respect decisions. We collaborate and create excellent results through teamwork and open dialogue.

#### We strive for excellence.

We deliver sustainable, high-quality solutions and create ideas and results that exceed the expectations of our stakeholders. Excellence is not just a goal but a habit that drives us to inspire those around us.

#### We are committed to the success of our customers.

We support our customers' success. To create long-lasting business relationships, we systematically and continuously improve our operational, commercial, and financial processes, keeping the customers' interests in mind.

#### We put safety first.

Safe and healthy workplaces are our top priority and the reason why we exist. We continuously strive to enhance the safety and health of our employees, customers, and suppliers.



Safety first! We never compromise on safety. It is the foundation of everything we do.

<b>ENVIRONMENTAL RESPONSIBILITY</b> Climate, energy and resources Product and solutions responsibility	page 4 4
SOCIAL RESPONSIBILITY Working conditions Equal treatment and opportunities for all Other work-related rights Social engagement	5 5 6
GOVERNANCE Protection of whistleblowers Political engagement Relationships with suppliers Corruption and bribery External communications	7 7 7 7 8



### ENVIRONMENTAL RESPONSIBILITY

#### Climate, energy and resources

We focus our efforts on the areas where we operate and where we believe we can make the greatest difference. We aim to minimise our environmental impact through reduced emissions and waste, optimised transportation, increased recycling and sustainable procurement.

HAKI Safety complies with all applicable environmental legislation, continuously improves its performance, and strives to minimise its adverse environmental impact.

We obtain and maintain all required environmental permits and other approvals for our operations. We conduct environmental due diligence to identify and assess the environmental impact associated with our operations.

We set long-term environmental ambitions and targets and actively work to improve our year-onyear environmental performance in our own operations. We aim to use materials and energy efficiently and improve circularity.

All our major production and warehouse sites should be certified according to ISO 9001 (quality) and ISO 45001 (occupational health and safety). All our major production sites should be certified according to ISO 14001 (environment).

Read more: Sustainability Targets and Group Environmental Policy

### Product and solutions responsibility

We aim to meet our customers' high demands, needs, and expectations by delivering high-quality services and products. All our products and services come with relevant product, service, and safety information. We place an increasing emphasis on the end-of-life management of our products, further strengthening the circularity of our products.

We systematically and continuously improve our operational, commercial, and financial processes, always considering our customers' interests.

We regularly evaluate our quality assurance measures through analysis, recording of discrepancies, and internal and external audits.



### SOCIAL RESPONSIBILITY

### Working conditions

HAKI Safety complies with laws and/or collective agreements in the countries in which we operate. We do not permit working hours that do not comply with national laws and industry standards. We strive to be on par with similar companies in the industry regarding salary levels and the competitive situation regionally and globally.

### Read more: Global Salary Policy

We strive to communicate well with each employee through company information and consultation procedures. We respect our employees' right to be represented by unions and to participate in collective bargaining. We also respect an employee's right not to join a union. Regardless of their choice, no one should be subject to discrimination.

HAKI Safety aims to provide a safe and secure work environment where people are not subject to unnecessary risks that affect their physical or mental health. We want to help prevent mental illness by talking openly about it and offering mental health professionals when needed.

### Read more: Global Work Environment Directive

We give employees appropriate training and instructions for safe work. All employees must follow safety instructions and engage in safety improvement activities, including reporting near misses and hazards. We instruct contractors in relevant health and safety matters and expect them to follow applicable regulations and HAKI Safety-specific instructions. For health and safety reasons, it is never acceptable to be intoxicated or under the influence of drugs at work.

### Read more: Global Alcohol, Drugs and/or Harmful Use Policy

Employees are encouraged to develop their skills and fulfil their potential, taking advantage of training, development, and progression opportunities at HAKI Safety. They are also entitled to regular performance reviews.

Read more: Global Employee Handbook

### Equal treatment and opportunities for all

HAKI Safety engages in fair workplace practices and expects everyone to be treated with dignity and respect.

We believe in an inclusive culture, which means that all our employees are treated fairly and with respect, can make a professional career, are seen and heard, and have the opportunity to thrive and grow. Employees shall be rewarded correctly and fairly according to their company contribution and performance. Discriminatory or unjustified salary differences between employees should not occur.

We are committed to providing equal opportunities throughout employment, including in the recruitment, training and development of employees, and proactively tackling and eliminating direct or indirect discrimination.

Nobody should be treated less favourably on the grounds of disability, gender reassignment, marital status, pregnancy or maternity, race, religion or belief, sexual orientation, work pattern, age, colour, nationality or any other aspects unrelated to their current and potential skills, talents and abilities.

Read more: Global Diversity, Equity & Inclusion Policy

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We have zero tolerance for harassment and victimisation. Harassment of any description is classified as gross misconduct, and incidents will be handled under the disciplinary procedure.

Read more: Global Harassment and Victimisation Policy

### Other work-related rights

HAKI Safety does not tolerate child labour or other forms of exploitation of children in our operation or value chain. No children under the compulsory school age, and in any case not younger than 15 years old, are allowed to be employed by HAKI Safety on a permanent basis. No hazardous work is permitted for those under 18 years of age. We do not accept any forms of modern slavery, such as forced labour, bonded labour or human trafficking.

We respect the privacy of all individuals and do not collect and store personal information without good reason. We also comply with all relevant data protection laws and regulations and ensure that all personal information is handled appropriately.

Read more: GDPR Policy

### Social engagement

Our operations contribute to economic development by creating direct and indirect job opportunities and financially supporting the societies in which we operate. We participate in projects and cooperate with industrial networks, schools, technical colleges, universities, and research institutes when possible.

We prioritise supporting and sponsoring organisations that share our values and benefit the local societies in which we operate.

Read more: Global Sponsoring Policy



### GOVERNANCE

### Protection of whistleblowers

HAKI Safety encourages employees to report to their immediate manager when they suspect that laws, human rights or the Code of Conduct are being violated. You may report to HAKI Safety's whistleblowing reporting service if routine procedures cannot be used. You may be anonymous there, and your report will be handled as strictly confidential. Our Whistleblowing Directive does not allow retaliation towards anyone raising concerns in good faith.

Equally, suppliers and business partners are encouraged to utilise our whistleblowing reporting service in the event of any perceived misconduct.

Read more: Whistleblower Directive and www.hakisafety.com/about-us/whistleblowing

#### Political engagement

HAKI Safety does not engage in the politics of the countries in which we operate, nor do we make political donations. We do not comment on politics or make political statements when representing our company.

We do not engage with associations whose agenda contradicts HAKI Safety's Code of Conduct. Membership in industry interest groups should not be interpreted as HAKI Safety's endorsement of all actions or statements the respective organisation makes.

#### Relationships with suppliers and business partners

Our supplier and business partner selection process should be thorough, unbiased, and transparent.

We expect the same level of integrity and ethical behaviour from our suppliers and business partners as they can expect from us.

### Corruption and bribery

We are committed to conducting business with high integrity and have zero tolerance for bribery and corruption. Therefore, we never offer gifts, benefits, or payments that could influence or be seen to influence the objectivity of the recipients' decisions or that breach legislation and/or local practice. We also do not accept gifts, benefits, or payments that could influence or be seen to influence the objectivity of our decisions or that breach legislation and/or local practice.

No employee should give or appear to provide improper advantages to any individual, entity or organisation on behalf of HAKI Safety. In addition, employees may not use their positions at HAKI Safety for inappropriate personal gain, either for themselves or for family members, friends or other associates.

We do not participate in any corrupt or other criminal activity.

We support and strive for fair competition and never enter into discussions or agreements with competitors concerning pricing, profit margins, bids, market sharing, or other similar activities. We never restrict competitors' market access by abusing our market position and respecting our customers' independence.



### External communications

All communications from HAKI Safety must be timely, accurate, relevant, and clear and meet the requirements of the stock market regulations.

Marketing shall be respectful, not demeaning or misleading, and adhere to fair competition. This also applies to our social media channels.

We respect all employees' freedom of expression about matters that concern them personally but encourage them to communicate HAKI Safety information with sound judgment and in accordance with applicable laws and regulations.

Read more: Global Communications Directive