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Standard Operating Procedure  
JVo / 10.1.2022  
10.1.2022  
31.12.2023  
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**Approved by:** ABk  
**Document ID/version:** 999 / 03



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**0. VERSION HISTORY**

<i>Version</i>	<i>Author</i>	<i>Date</i>	<i>Description</i>
01	PJu	02.04.2018	First version of the document.
02	JVo	14.01.2020	Updated version of the document.
03	JVo	10.01.2022	Updated version of the document.

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## 1. DEFINITION

This document describes the Code of Conduct policy of company AB SOLVING OY (the Company), Pännäistentie 181, 68600 Pietarsaari, Finland, VAT No FI02092316.

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## 2. MANAGEMENT SYSTEM

The Company confirms to have a management system in place to enable adherence to this Code of Conduct, as well as other relevant and applicable laws and regulations. The function and quality of the management system shall be in proportion to the size, complexity and risk environment of the Company's business. This means that, at a minimum:

- the Company shall adopt a systematic approach to the assessment, mitigation and management of risks related to human and labor rights, occupational health and safety, responsible business and environmental impact (hereafter referred to as "Code of Conduct Issues"),
- the Company shall adopt measurable performance targets in relation to Code of Conduct Issues and define related actions to reach these targets with a view to ensure continuous performance improvement,
- the Company shall duly apply and communicate with applicable laws, regulations and contractual terms governing the Company's assignments, with sufficient training provided to relevant employees and business partners,
- the Company shall have systems in place to enable the reporting of Code of Conduct Issues-related grievances
- the Company shall monitor that its own suppliers and sub-suppliers comply with an equal CoC as the Company or their own equivalent CoC.



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### 3. HUMAN RIGHTS

The Company confirms:

- to respect human rights and not be complicit in human rights violations within its sphere of influence,
- to duly map its human rights impacts whenever the need for such action is agreed,
- to have in place adequate remedial mechanisms in case of any human rights violations.

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#### 4. BASIC WORKER'S RIGHTS

The Company confirms:

- not to employ any workers below 15 years (14 years in certain developing countries) or the minimum age according to national legislation, whichever is higher (in line with the ILO Convention 138 on child labor),
- to ensure that employing young people above minimum age but under 18 years does not jeopardize their education, health, safety or morals,
- to fully recognize employees' right to organize, belong to a union and bargain collectively,
- not to use any forms of involuntary labor,
- not to discriminate against any employee,
- to treat all employees fairly and respectfully.

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## 5. WAGES AND WORKING HOURS

The Company confirms:

- to pay employees at least the minimum wage and applicable overtime wages defined by national laws or applicable collective agreements,
- to apply normal working hours that comply with applicable law and collective agreements and where no such laws or collective agreements exist working hours will not exceed 40 hours per working week on a regular basis,
- to provide all employees with at least one rest day in seven consecutive working days unless regulated otherwise by applicable laws.

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## 6. OCCUPATIONAL HEALTH AND SAFETY (OHS)

The Company confirms:

- to fulfil all applicable legal OHS requirements,
- to have a written OHS policy of its own, to demonstrate management's commitment to OHS, and to assign responsibility for OHS within its organization,
- to ensure that operational controls such as rules and procedures are in place and communicated to all employees,
- to have emergency preparedness and response procedures in place,
- to increase its employees' awareness of health and safety issues, to enhance safety culture through open communications, and to ensure that its staff have received appropriate OHS training.
- to measure and monitor its OHS performance and OHS hazards with the help of properly conducted workplace inspections and audits,
- to report and investigate all health and safety incidents.

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## 7. ENVIRONMENTAL IMPACT

The Company confirms:

- to fulfil all environmental requirements defined in relevant laws, regulations and environmental permits,
- to assign responsibility for environmental issues within its organization,
- to ensure that its employees have appropriate knowhow and experience in relation to environmental issues, as well as resources to enable them effectively to meet their responsibilities,
- to ensure that written instructions covering all processes with potential environmental impacts, such as the storage and handling of hazardous materials, are available and that the relevant information is communicated to all employees involved,
- to proactively work to prevent emergencies and ensure the capacity to react appropriately to such events, by analyzing, identifying and adopting suitable preventive and corrective measures,
- to handle environmental violations and complaints systematically and communicate them to employees and external stakeholders,
- to provide the Customer with up-to-date material safety data sheets, as applicable, and any other relevant documents and information

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## 8. RESPONSIBLE BUSINESS

The Company confirms:

- to conduct business in compliance with all applicable antitrust and fair competition laws,
- to act in compliance with applicable anti-corruption laws, by, among other things, refusing to receive or offer bribes, facilitation payments or anything of value for the purpose of obtaining or retaining business or any improper benefit or advantage,
- to act in compliance with all rules and regulations related to the safety and quality requirements of products and services, including rules defined by Customers,
- to transparently and accurately record and disclose details of its business activities, corporate structure, financial situation and performance in accordance with applicable laws and regulations.
- to request that the Customer's representatives shall always pay for their own travel and accommodation costs when visiting the Company, conferences, reference plants e t c,
- not to offer any gifts, hospitality or expenses that could be considered unreasonable or inappropriate with regard to possible business transactions.



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## 9. GENERAL REQUIREMENTS

The Company confirms:

- to report any non-compliance with this CoC to any actual business partner or contract part,
- to disclose information and data regarding issues covered by this CoC at the request of actual business partner or contract part, unless this would conflict with its statutory obligations on disclosure of information,
- to allow any actual business or partner or contract part, or any third party authorized by an actual business partner or contract part, to conduct in the presence of the Company an audit of the Company's operations relevant for this CoC including but not limited to the Company's facilities, and relevant extracts from books and records. At the Company's request, the parties involved in any such audit shall enter into a confidentiality agreement regarding the circumstances disclosed in the audit.

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**10. SIGNATURE**

Date and place: January 10<sup>th</sup>, 2022, Pietarsaari, Finland

Peter Björk, Managing Director