



Componenta Corporation
Code of Conduct
for Suppliers and
Subcontractors

COMPONENTA

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Code of Conduct for Suppliers and Subcontractors

This Componenta Code of Conduct for Suppliers and Subcontractors ("Code") illustrates the values according to which Componenta operates. The Code is based on Componenta's Code of Conduct. Componenta expects all of its suppliers and subcontractors to conform to the provisions defined below in their dealings with Componenta, their own employees, subcontractors and suppliers, as well as third parties.

In order to assess compliance with this Code Componenta may visit, or let external monitors visit, its Suppliers' and Subcontractors' facilities, with or without notice. Violations of this Code may result in immediate termination of collaboration, and also in legal action.

1. Legal Compliance

Componenta requires its Suppliers and Subcontractors to comply with applicable laws and regulations in all locations where Supplier or Subcontractor conducts its business.

Suppliers and Subcontractors are also required to support and respect the protection of international codes, such as United Nation's Universal Declaration on Human Rights, UN Guiding Principles on Business and Human Rights, OECD's Guidelines for Multinational Enterprises, UN Convention of the Rights of the Child, Fundamental ILO Conventions and the UN Convention against Corruption.

2. Labour and Human Rights

2.1 Human rights

Suppliers and Subcontractors conduct their business in a manner that supports and respects the protection of internationally proclaimed human rights. Suppliers and Subcontractors should make sure that they are not complicit in human rights abuses.

2.2 No child or forced labour

Suppliers and Subcontractors shall not use child or forced labour under any circumstances or contract with suppliers or subcontractors using such labour. If the local law does not specify a minimum legal age of employment, it shall be 15 years or the age of completion of compulsory education, whichever is higher.

2.3 Fair treatment, dignity and respect

Suppliers and Subcontractors shall treat their employees with dignity and respect and shall ensure that their employees have a fair and equal working environment. Any form of harassment, violence or verbal abuse of employees shall not be used or accepted. Componenta shall not tolerate any kind of harsh or inhumane treatment, coercion or corporal punishment. Suppliers and Subcontractors shall not discriminate against employees in hiring, promotion or salary based on race, colour, gender, religion, national or ethnic origin, age, sexual orientation, parental or marital status or any other characteristic protected by law.

2.4 Working hours and compensation

Suppliers and Subcontractors shall ensure that compensation paid to their employees complies with applicable labour laws, including minimum wage laws, overtime wages and mandatory benefits.

2.5 Freedom of association and collective bargaining

Componenta expects its Suppliers and Subcontractors to recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with the laws of the countries in which they are employed as well as the ILO conventions.

2.6 Health and safety

Suppliers and Subcontractors shall ensure that working conditions allow their employees to perform their tasks safely and efficiently. Suppliers and Subcontractors shall have procedures for identifying, minimizing and preventing hazards and emergency situations. Appropriate health and safety information, training and protective equipment is provided to Suppliers' and Subcontractors' employees. Componenta expects Suppliers and Subcontractors to have effective safety policies in place to support accident prevention, emergency response plans and minimising of health risk exposures.

Clear procedures shall be in place to identify, manage, record and report occupational injuries and illnesses appropriately. Where hazardous substances are used, relevant supervision, controls and emergency plans shall be provided.

3. Environment

Suppliers and Subcontractors shall make reasonable efforts to protect environment and to keep the impact of its activities and products on the environment as low as possible. Energy conservation, recycling, appropriate disposal of waste and waste reduction shall be promoted to the extent possible. Suppliers and subcontractors shall be well-informed about environmental legislation, applicable

regulations and internationally recognized standards, and be able to provide evidence of compliance. All required environmental permits and registrations shall be obtained and maintained, and the operational and reporting requirements associated with such permits shall be followed.

4. Responsible Business Practices

4.1 Anti-corruption and anti-bribery

Componenta expects Suppliers and Subcontractors to have zero tolerance towards any form of corruption, bribery, extortion or embezzlement.

No direct or indirect payments or hospitalities (such as entertainment or gifts) of an excessive nature shall be made by Suppliers or Subcontractors for the benefit of Componenta's employees or their family or friends, any governmental representative or employee or any other party for the purpose of obtaining benefits of any kind.

4.2 Conflicts of interest

Suppliers and Subcontractors shall avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest while engaged with Componenta. A conflict of interest occurs when a representative of a Supplier or a Subcontractor seeks to further his/her personal interest, or that of a friend or relative, due to his/her position as a representative of a Supplier or a Subcontractor.

4.3 Intellectual property rights

Suppliers and Subcontractors shall conform to all applicable laws and international treaties on intellectual property and to refrain from infringing on either Componenta's or third party's intellectual property rights. All confidential information provided by Componenta and its business partners shall be protected. Suppliers and Subcontractors are entitled to publicize their cooperation with Componenta only to the extent Componenta has expressly given prior written authorization.

4.4 Fair competition

Suppliers and Subcontractors shall commit to competing in a fair manner in compliance with all applicable competition laws and regulations. This applies to the general market conduct and other situations, such as (but not limited to) contact with competitors, exchange of information and industry associations. Suppliers and Subcontractors shall not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of applicable antitrust or other laws regulating competition.

4.5 Money laundering

Suppliers and Subcontractors shall be strictly against any form of money laundering and shall to the extent possible ensure that their finance operations shall not be used for money laundering purposes.

5. Reporting Violations

Any material non-compliance with this Code shall be promptly reported to Componenta. Violations can be reported to your Componenta contact or through the whistleblowing channel:

Email

whistleblow@componenta.com

Regular mail

Componenta Corporation
Legal Affairs
Teknobulevardi 7
FI-01530 Vantaa, Finland

COMPONENTA

Contacts

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