Componenta Corporation's
Code of Conduct

COMPONENTA

Dear Componenta colleague,

Componenta's success is built on trust. Our customers are global machine and equipment manufacturers who choose us as their long-term partner because they can rely on our quality, our delivery reliability and on us doing the right thing. The same trust forms the foundation of our cooperation with our suppliers, our shareholders, the surrounding society and our fellow Componenta employees.

The Code of Conduct describes what responsible conduct means at Componenta in practice. It brings together our ways of working and the principles to which we are committed. These include, for example, a safe working environment, respect for human rights, fair competition, the prevention of corruption and the protection of confidential information. The Code cannot cover every situation. It does, however, give us direction when we make decisions in our everyday work.

The Code is founded on our shared values: openness, honesty and respect. Openness means that we have a positive attitude towards change and development and that we raise issues with courage. Honesty means that we keep our promises. Respect is reflected in our cooperation with colleagues, customers and partners being based on mutual respect.

The Code of Conduct applies to each one of us, regardless of position, role or location. I expect everyone to read this Code carefully and to follow it



in their own work. In addition, I expect managers to lead by example. If you are unsure of the right course of action, ask for advice. If you notice something that is not in line with the Code, speak up. A report made in good faith will not result in any negative consequences for the person making it.

Thank you for helping to build a Componenta that customers, partners and colleagues can trust.

Sami Sivuranta
President and CEO, Componenta Corporation

Componenta Corporation's Code of Conduct

1. Scope and approval of the Code

Componenta's Code of Conduct (the "Code") describes commonly accepted practices, and our commitment to compliance with laws and regulations.

The Code applies to all Componenta employees, whatever their role or work may be. It is the responsibility of each Componenta employee to promote the Code.

The Code has been approved by the Board of Directors, and it is effective as of 29 October 2026 until further notice. The Board of Directors periodically reviews the Code and follows its implementation.

References to "Componenta" in the Code include Componenta Corporation and all of its subsidiary companies where Componenta has a majority ownership or control.

2. Compliance with laws, other regulations and guidelines, ethical decision-making and responsibilities

The Code does not provide detailed guidance about compliance with all of the laws and regulations under which Componenta operates. Componenta employees are responsible for complying with all applicable local laws and regulations. Where applicable local laws are stricter than this Code, the stricter local laws shall be complied with.

Each Componenta employee is responsible in all his/her work for complying with internal, customer and other external as well as legal requirements.

Componenta has issued separate policies and guidelines with respect to inter alia HR matters, quality, environment, insider matters, communications, fair competition, as well as data protection and information security. Componenta employees are responsible for complying with these policies and guidelines, as well as Componenta's other policies and guidelines.

Componenta supports and respects the principles set out e.g. in the following universal declarations and agreements:

- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- OECD's Guidelines for Multinational Enterprises
- Fundamental ILO Conventions
- UN Convention of the Rights of the Child
- UN Convention Against Corruption

3. People, human rights and a safe workplace

Componenta complies with local labour laws, collective bargaining agreements and legislation on human rights and equality in all its countries of operation. Componenta respects its employees' freedom of association and the right to collective bargaining.

Componenta does not tolerate any discrimination based on an employee's origin, nationality, religion, race, ethnic origin, gender, sexual orientation, gender identity, disability, political opinions or age, or any other form of discrimination prohibited under Finnish or EU legislation. Under Componenta's values and management principles, all decisions pertaining to recruitment, compensation and promotion are based solely on an individual's competence and performance.

Componenta condemns all forms of forced labour and child labour and does not accept slavery, human trafficking, harassment, bullying, violence, threats or any form of subjugation in its operations or its supply chain.

Everyone has the right to a safe working environment. Every Componenta employee follows safety

instructions, uses the necessary protective equipment, reports hazardous situations and stops work if it poses an immediate danger.

4. Anti-corruption, bribery, hospitality, conflicts of interest and political activities

Componenta employees shall not offer or pay any illegal or improper payments, facilitation payments or bribes or offer or give any other undue advantage in order to obtain or retain business. The prohibition applies to direct and indirect payments, advantages and promises, regardless of their value or local practices. In addition, Componenta employees shall not, directly or indirectly, pay or give any advantage to facilitate favorable decisions or services from authorities.

Componenta employees may not engage in any act that might result in a conflict between Componenta's interest and their own or another person's or organisation's interests. This includes but is not limited to acceptance and giving of personal gifts or hospitality from or to Componenta's stakeholders, other than gifts of nominal value of less than EUR 100 or reasonable hospitality given in the ordinary course of business. Gifts and hospitality must always be reasonable, occasional, transparent and justified from a business perspective.

Componenta employees shall not cause Componenta to engage in a business transaction with the employee's family, relatives or friends, unless specifically approved in accordance with the "one over one" principle. Componenta employees shall promptly report any actual or potential conflicts of interest to their line manager or, where necessary, to the General Counsel.

Componenta employees shall not seek benefits for themselves or for their family, relatives or friends through the use of corporate information or through their position with Componenta or by using Componenta's assets. Componenta employees shall not engage in any activity that competes with the business of Componenta.

Componenta respects its employees' right to participate in political activities as private individuals. Unless otherwise decided by the President and CEO or the Board of Directors of Componenta Corporation, Componenta does not participate in politics or political activities, and company funds shall not be used to make any kind of political contributions.

5. Environment

Componenta takes responsibility for the environment, and environmental management is part of the company's day-to-day business. Componenta aims to reduce the environmental impact of its operations by developing its production methods and processes, using materials and energy efficiently, and preventing and reducing emissions from its operations. The operations of all Componenta production units are governed by a certified environmental management system, which supports compliance with requirements, commitment to environmental matters and continuous improvement.

6. Fair competition

Componenta competes fairly and complies with competition laws in all markets in which it operates. We do not enter into agreements or exchange information with competitors on prices, customers, markets, production volumes or other matters that restrict competition. In unclear situations, advice must be sought from Componenta's General Counsel before taking any action.

7. Trade compliance, sanctions and anti-money laundering

Componenta complies in all its operations with applicable laws and regulations relating to trade, exports, imports, sanctions and anti-money laundering.

Componenta shall not engage in transactions that are in breach of applicable sanctions, export control regulations or other trade restrictions. When conducting business, we must know our customers, suppliers, other business partners and the countries involved in the transactions, and ensure that the applicable restrictions are complied with.

Componenta does not accept money laundering, terrorist financing or any other illegal activity intended to conceal the origin or use of funds.

If an employee suspects that a transaction may be in breach of applicable trade regulations, sanctions or anti-money laundering requirements, he or she shall put the matter on hold and seek advice from Componenta's Legal function before taking any action.

8. Confidential information, insider information, communications, data protection, cybersecurity and AI

8.1 Confidential information

From time to time during the course of employment, Componenta employees may become aware of confidential information about the business affairs of Componenta or other companies with which Componenta has relationships. Such confidential information includes without limitation the following non-public information:

- Componenta's strategy and business plans
- Componenta's future plans (e.g. proposed capital investments, proposed market entries and proposed changes in capacity)
- Financial information relating to Componenta
- Information relating to Componenta's manufacturing processes and methods, volumes manufactured and costs
- Componenta's trade secrets (e.g. design information relating to the products designed by Componenta)
- Information relating to the sales (e.g. prices, discounts, margins, volumes, other terms of sale, information relating to quotations)
- Information relating to the purchases of Componenta
- Mergers and acquisitions
- Specifications, drawings and other information provided by Componenta's customers
- Information relating to agreements with customers

All Componenta employees shall treat such information as confidential and shall not directly or indirectly disclose, publish, or otherwise make available any such information or any portion thereof to any entity or person other than another employee of Componenta with the need to know such information or as otherwise directed by Componenta. All employees must also take reasonable precautions to prevent any unauthorized use or disclosure of confidential information.

Any disclosures to third parties directed by Componenta shall be subject to the respective third party having signed a non-disclosure undertaking before the delivery of confidential information. A separate non-disclosure undertaking is not needed in case the long-term agreement between Componenta and the respective third party includes a proper bilateral clause regarding the protection of confidential information.

The specifications and drawings provided by customers shall be stored in a safe place and protected against unauthorized access. The specifications and drawings provided by customers may only be disclosed to third parties (e.g. Componenta's subcontractors) after Componenta has acquired a prior written permission from the respective customer and after the respective third party has signed a non-disclosure undertaking.

8.2 Insider information

The shares of Componenta Corporation are listed in Nasdaq Helsinki.

Componenta employees may from time to time possess precise and unpublished information related to Componenta or Componenta's shares which, when released, is likely to have a significant effect on the price or the value of the share in question (''insider information'').

Componenta employee who possesses insider information may not

- **use insider information to his/her own or a third party's benefit to acquire or dispose of Componenta's shares;**
- **advise, directly or indirectly, a third party in trading with Componenta's shares;**
- **cancel or amend an assignment regarding Componenta's shares; or**
- **disclose the insider information to a third party, unless such disclosure takes place in the normal course of work of the person making the disclosure.**

Disclosing insider information, even though it takes place as part of the ordinary performance of work of the person disclosing the information, is permitted only if the recipient of such information is subject to a confidentiality obligation and knows of the confidential nature of such information: if deemed necessary the person shall be notified that the information disclosed is insider information and shall be kept confidential. In addition, the recipient of the information shall be added to the respective insider register.

Any Componenta employee or other person is subject to the prohibitions and restrictions on using, disclosing and recommending on the basis of insider information whenever he or she possesses insider information concerning Componenta, including information obtained by chance.

The above provisions apply also to securities of Componenta entitling to a share (e.g. convertible bonds, option rights, bonds with warrants, equity warrants and subscription rights) as well as other kinds of securities issued by Componenta.

Each Componenta employee, who has received insider information, shall be personally responsible for his or her own compliance with the applicable legislation and regulations. A breach of the above described provisions is a criminal offence and sanctioned with fines or imprisonment. Violating the prohibition may also entail administrative sanctions.

8.3 Communications

At Componenta, the function of communications is to fulfil the disclosure obligations of a listed company, to manage the reputation of Componenta and to support the business operations and strategy of the Group through communication activities.

Componenta's publicity principles are based on openness, consistency, impartiality and transparency while observing the regulations pertaining to listed companies.

Componenta Corporation makes every effort to communicate in an equal manner in all situations, that is, to give the same information to all stakeholders at the same time.

The personnel authorised to issue statements regarding Componenta Group's financial situation are the President and CEO and the CFO. The financial communication and reporting of Componenta Corporation is the responsibility of the CFO. The issuing of stock exchange releases subject to the ongoing disclosure obligation is decided on by the President and CEO, the CFO and the General Counsel.

The President and CEO and the CFO are responsible for Componenta's media relations, the preparation of information for publication, and compliance with the disclosure policy. Representatives of the Group's business units also participate in the preparation of information pertaining to their business area.

Componenta will not deal with or comment in public on information about customers, subcontractors or suppliers, concerning sales or delivery agreements for example, unless this has been specifically agreed with them.

Social media

Componenta respects the freedom of opinion and expression. When using social media, Componenta employees shall take into consideration the effect of their statements on the image and reputation of Componenta.

Componenta employees are expected to take responsibility for what they write and exercise good judgment and common sense when giving statements that relate to Componenta. Componenta encourages employees to communicate transparently, using their own name. Componenta employees shall also make clear that they are speaking for themselves and not on behalf of Componenta. Managers should pay special attention to how they express issues related to Componenta and understand that their personal views could be mistaken to represent the official viewpoint of Componenta.

8.4 Data protection

Componenta respects privacy and processes personal data carefully, lawfully and only for legitimate purposes. Componenta employees are obliged to protect the personal data in their possession and to comply with applicable data protection legislation, company guidelines and contractual obligations.

8.5 Cybersecurity

Componenta's data, systems and digital services are key assets of the company. Every Componenta employee must act with due care to protect data, comply with the company's information security guidelines and report without delay any suspected information security breaches, phishing attempts or other cybersecurity threats in accordance with the information security guidelines. If in doubt, always report.

8.6 Artificial intelligence

Componenta encourages the responsible use of the AI services provided by Componenta to develop the business and to support work. When using AI, applicable laws and company guidelines must be complied with, and the confidentiality of information, data protection and the appropriate verification of the generated output must be ensured. For example, personal data and drawings owned by customers must not be entered into AI services. The use of AI does not relieve the user of responsibility; the user must understand the content produced with the help of AI and sufficiently verify its accuracy before using it.

9. Company's assets

Each Componenta employee must take care of Componenta's tangible assets (such as fixed assets and inventories) and intangible assets (such as intellectual property rights and confidential information).

Every employee must adequately protect Componenta's property from damage, unauthorized use, and loss. Componenta's assets may not be used for personal or other purposes outside the company without permission.

Componenta's employees must respect the property rights of others. Componenta employees must file company documents in accordance with applicable laws and company guidelines.

10. Componenta's suppliers, subcontractors and other business partners

Componenta requires its subcontractors, suppliers and other business partners to comply with applicable laws and regulations. The suppliers and subcontractors are also required to support and respect the protection of internationally proclaimed human rights, as defined in United Nation's Universal Declaration on Human Rights as well as the basic labour rights as defined by the International Labour Organization.

In addition, Componenta has Code of Conduct for suppliers and subcontractors.

11. Questions, reporting violations and investigations

If you have any questions regarding this Code, please contact your line manager or the General Counsel.

It is the responsibility of each Componenta employee to report on violations of any law, the Code or any Componenta guidelines or policies. Componenta employees may report violations of the Code or any Componenta guidelines or policies to their line managers. It is the responsibility of all Componenta line mangers to give advice on the proper procedure in case of violations. Also, the General Counsel can be contacted in the matter.

Any suspected infringements of the Code or rules and regulations can be also reported through the anonymous whistleblowing channel: https://report.whistleb.com/fi/componenta. Reports can also be submitted by regular mail to Componenta Corporation, Legal Affairs, Teknobulevardi 3–5,

FI-01530 Vantaa, Finland. In addition to Componenta employees these reporting channels are also available to all third parties.

Regardless of the reporting channel, all allegations of potential violations of the Code or any Componenta guidelines or policies made in good faith will receive an impartial, confidential, fair, equitable and comprehensive investigation conducted with the relevant internal and/or external assistance.

Acts inconsistent with the Code or any Componenta guidelines or policies must be promptly corrected and are subject to disciplinary action, up to and including termination of employment in case of gross misconduct. Failure to follow the Code and the applicable laws may result in prosecution of and sentence to both the employee and the respective Componenta company.

Componenta will ensure that there will be no adverse consequences for any employee reporting violations of any law, the Code or any Componenta guidelines or policies. Whistleblowers acting in good faith are protected against retaliation. Knowingly reporting false information is not acceptable.

COMPONENTA

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