

Code of Conduct

"Together, we shape a culture where our actions resonate with ethical and responsible choices in our daily work and in the way we treat each other, our customers and suppliers."

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Dear Colleagues,

Responsibility has been a cornerstone of Stalatube's operations for over 50 years. Since our founding in 1972 Environmental, Social and Governance (ESG) aspects have been included in company values.

The Code of Conduct applies to all Stalatube people around the world. The Code of Conduct describes our ways of working and how we are committed to act legally and ethically. Our customers expect this from us and by doing this we also create a safe, and good working environment for all Stalatube employees.

At Stalatube, we have zero tolerance for non-compliance with laws and regulations. Our Code of Conduct sets forth the principles that guide us in implementing Stalatube values daily. It serves as a compass for our actions and as a benchmark for our partners, ensuring that we make sound decisions in our day-to-day operations.

Through these practical rules and common operating model, we support the implementation of our strategy. As we look ahead, our strategy positions us as a forerunner in terms of corporate responsibility. This commitment extends beyond environmental considerations. We recognize the broader impact of our operations on society and are dedicated to

social responsibility. Our governance practices are designed not just to meet legal requirements but to uphold the highest standards of transparency, fairness, and accountability.

We have made a commitment to reducing the environmental impact of our products. Environmental considerations permeate every aspect of our business – from product development and manufacturing processes to operations and managing our supplier network.

It is very important that each one of you familiarize yourself with this Code of Conduct and commit to its implementation and compliance with the rules therein. Together, we shape a culture where our actions resonate with ethical and responsible choices in our daily work and in the way we treat each other, our customers and suppliers.

Thank you for your dedication, your hard work, and your commitment to the values that define Stalatube. Together, we will continue to build a legacy of responsibility, integrity, and excellence.

Sami Packalén
CEO Stalatube Oy



Sustainable and responsible operations – we will carry the responsibility

OUR VISION

Stalatube is the best stainless solutions provider in its branch.

OUR VALUES

- **Value-added services to our partners and customers**
- **Honesty**
- **Yes we can**
- **Harmonious relationship with nature, society and individuals**
- **Family entrepreneurship**
- **Profitability**

Our history dates back to the year 1972. Our values are the soul of our company, guiding our actions and daily decision-making. We must ensure that these values also support all of our future endeavors.

Ethical and responsible business is the basis of our operations. Our customers must be able to trust us, and we should take pride in it. Doing business in fluctuating market situations can, however, pose challenges. We may occasionally find ourselves in everyday situations where we're not sure how to act. These guidelines work in connection with our policies to provide clear instructions for those kinds of situations. They secure our strong commitment to ethical and responsible business operations, as well as our compliance with local laws and regulations. The guidelines explain principles to which we should all adhere.



Effects to the world around us

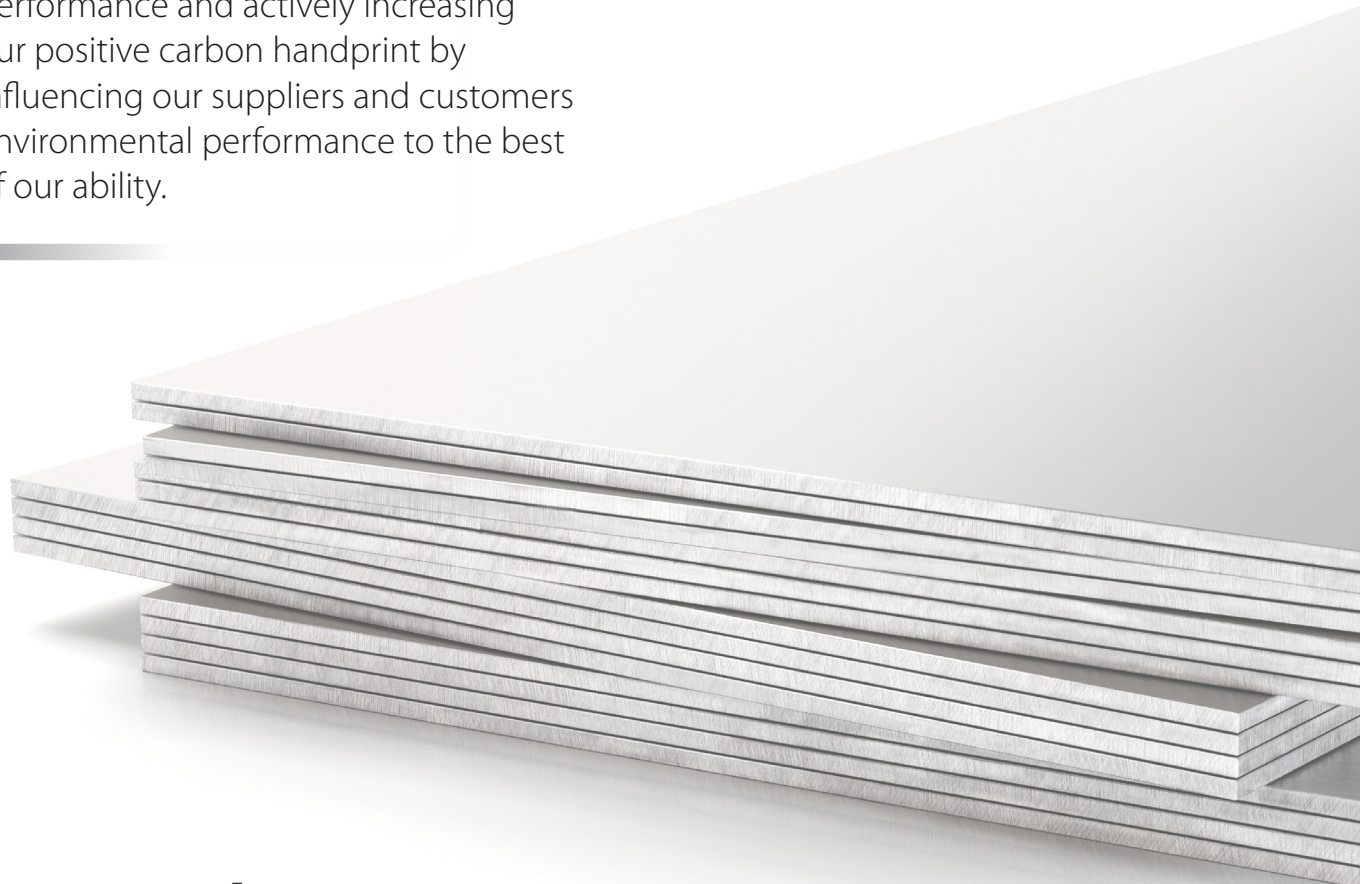
We are committed to recognizing the effects of our operations on the global environment and minimizing the negative impacts while contributing to a sustainable future. ***We aim to be in the frontline of our industry.*** This means reducing our emission intensity year on year.

We demand the same responsibilities from our suppliers, so that they fulfill the environmental demands defined in applicable laws, regulations, and permits. We expect suppliers in our value chain to meet or exceed the mentioned requirements and show continuous effort to improve their performance.

A supplier is responsible for controlling, measuring and minimising the environmental impact of their operations, and must obtain and retain necessary permits and licenses and comply with their reporting requirements. Suppliers must aim to avoid or minimize waste and emissions caused by their operations and to manage their waste in a lawful and responsible manner.

Suppliers must adopt an environmental management system (such as ISO 14001 or similar) to ensure the implementation of necessary actions to protect the environment and follow all applicable processes.

We are committed to continuously improving our environmental performance and actively increasing our positive carbon handprint by influencing our suppliers and customers environmental performance to the best of our ability.





Society that we're a part of

All employees and interested parties are treated with equality, respect and without discrimination.

Human rights, equality, non-discrimination and remuneration principles

We are committed to the UN Universal Declaration of Human rights and the Guiding Principles on Business and Human Rights.

We want to employ the best available talent. Therefore, we offer a corporate culture that enables our employees opportunities for personal development. Recruitment and advancement opportunities are offered based on personal skills and performance and the role requirements. We do not discriminate in any aspect based on race, nationality, gender, religion, disability, sexual orientation, political views or any other non-work related quality. This includes all forms of employment, such as temporary and part-time employees. All forms of harassment, abuse and sexually or culturally inappropriate behaviour are never allowed.

We acknowledge and respect our employees' rights to assembly, right to organise and right to collective bargaining. We ensure that our terms of work, including compensation, employee benefits, working hours and holiday periods agree with legislation or applicable industry-specific regulations. We have a zero-tolerance policy for all use of child labor and forced labor throughout our value chain.

Health and safety

We want everyone to care for our coworkers and look after for their safety and wellbeing every day. Our company is committed to a 'zero accident' target, and we aim to prevent all accidents that may occur to employees, subcontractors, suppliers and customers. We want to build a safety culture where new improvements are sought pre-emptively every day. Everyone should observe and report all possible safety improvements. Work life balance as well as cognitive and psychosocial load must remain within everyone's individual tolerance.

Social media

We encourage our employees to have a dialogue with our partners, customers and the general public. At the same time do also take into account your loyalty obligation and the fact that you might be viewed as a representative of Stalalube, especially in professional social media.

As an employee, you are required to avoid anything that might conflict with the actions reasonably required of another employee in your position. The same respect and human behaviour must be exhibited online and offline.



Governance in our hands

Transparency of reporting, accounting and taxation

We are committed to paying the correct amount of taxes as per our social and legal obligations and legislation in all of our operating countries. We are also committed to managing processes relating to taxation in an efficient manner so that the result is due and correct for the company and all stakeholders. The management of all created information must be true and transparent.

Actions against money laundering

We co-operate only with reputable customers, consultants and partners who operate lawfully and whose assets come from legitimate sources. We do not further money laundering. To avoid any issues related to money laundering, employees should remain alert and notify management of any suspicious behaviour of customers, consultants or business partners.

Employees must comply with all bookkeeping, reporting and accounting requirements when handling cash payments as well as other remittances related to transactions and contracts.

Politically neutral as a company

As a company, we do not engage in governmental politics or bear any specific political agenda.

Fair competition, anti-corruption and anti-bribery

We believe in our ability to generate added value for our customers and view that as the primary driver in business decisions. We are committed to complying with applicable competition and antitrust laws and lawfully enforced trade sanctions in all business activities. All employees must understand the main rules of competition laws and are to act in accordance with them.

We do not approve of any form of bribery and corruption. We do not give or receive gifts that may inappropriately affect our business decisions or the decisions of our partners.

Due diligence

In order to identify, account, prevent and mitigate and account our environmental, human rights and other sustainability impacts we employ due diligence principles and actions to our own operations and through our value chain.

This process includes continuous materiality assessment to identify the positive and negative and the actual and potential impacts and their scope as well as implementing actions to reinforce the positive and to reduce the negative impacts.

We perform monitoring of our value chain through reporting and directed audits and will react to any shortcomings.





Practical advice and scenarios

Work-related functions

As a rule of thumb, Stalatube pays for attendance to work-related functions for its own staff. This may exclude some moderately priced exhibition passes or alike if received from a stakeholder.

Giving gifts and receiving gifts

Any gifts received or handed out in the course of business must be professional in nature and moderate in value. The maximum value of a business gift must not exceed 100 EUR. Gifts are to maintain relationships with our stakeholders and must be free of any obligations.

Advice for unclear situations

If you find yourself debating whether something is appropriate based on these guidelines, have a moment and ask yourself: *"How would this look to an outsider or a colleague?"* or *"Do I feel comfortable speaking openly about this to anyone?"*

Business with close relations / conflict of interest

When you recognize a business situation where another shareholder is either a relative or otherwise a close personal contact, assess with your superior if you are able to act in a neutral way. If you have any doubts, it's totally reasonable to excuse yourself without any negative consequences.

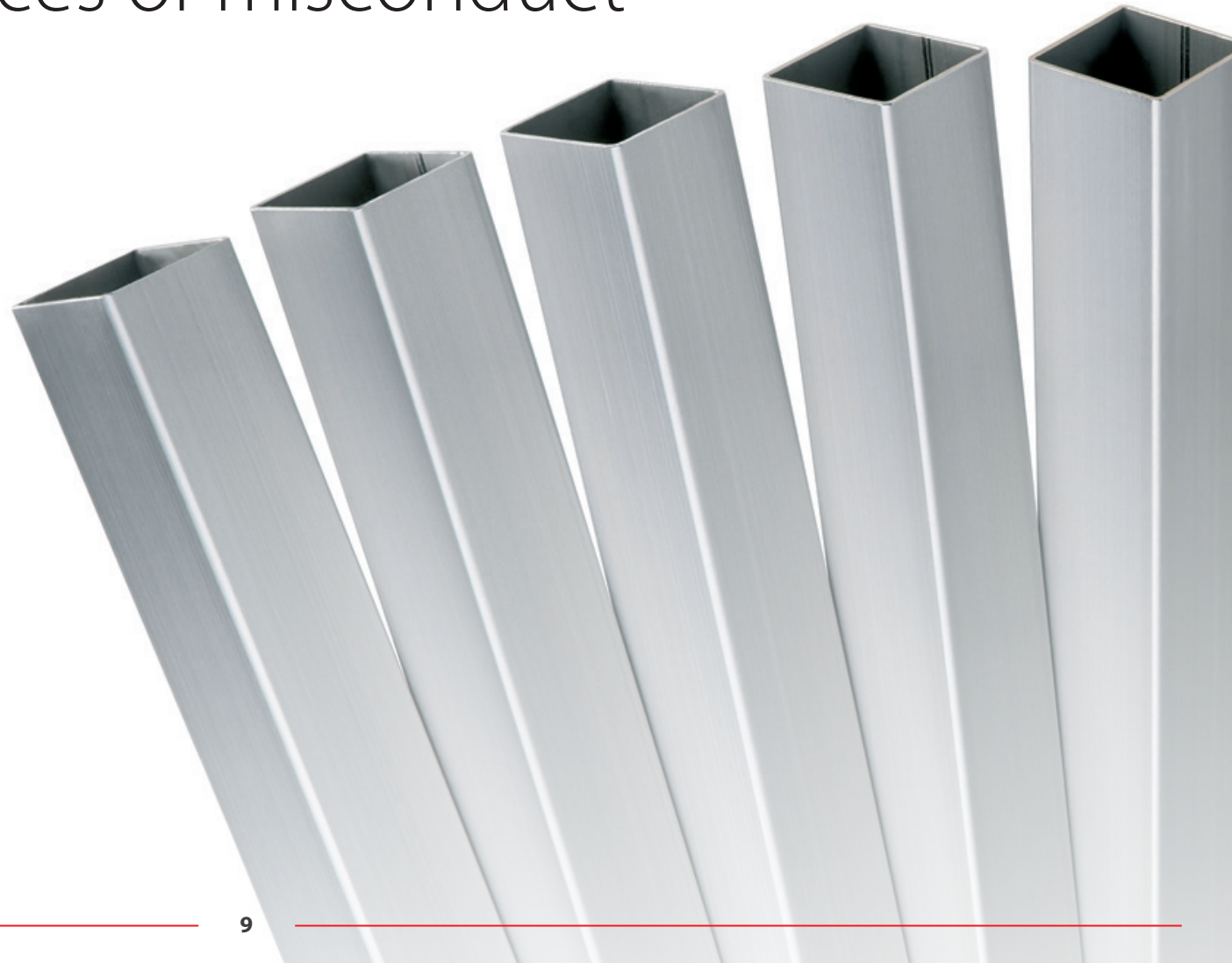


Reporting suspected misconduct and consequences of misconduct

We encourage all of our employees to discuss all concerns related to violation of this code with their superiors. For external stakeholders as well as own employees who choose to remain anonymous, we provide a whistleblower channel on our website.

Every violation of the Code of Conduct will result in actions, the nature of which is dependent on the case. Primarily we wish to resolve the conflicts in a constructive manner and restore compliance with the Code of Conduct. Illegal activities can lead to legal sanctions.

As a company Stalutube is committed to the guidelines and principles set in this Code of Conduct and the same rules apply to each individual.





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