



# Code of Conduct

## Introduction

To ensure a responsible conduct with respect to ethical, social and environmental matters, this Code of Conduct summarizes the requirements which Etra Oy (hereinafter referred to as "Etra") is committed to and which Etra also requires our suppliers (hereinafter referred to as "Supplier") to comply with.

**Mika Arvaja,**  
**CEO**

## 1. Business conduct

In all our operations, Etra shall be committed to ethical conduct and to respecting human rights in the spirit of international treaties and internationally recognized standards.

All forms of bribery, money laundering, corruption and unlawful restrictive trade practices are strictly prohibited. Etra shall ensure that our directors, employees and related third parties do not offer, promise, give or accept any bribes, or make or accept improper payments to obtain new business, retain existing business, or secure any other improper advantage.

Etra shall record and report all information regarding business transactions accurately and honestly and create, retain, and dispose evidence of such transactions in accordance with all applicable legal and regulatory requirements.

## 2. Labor and Human rights

### 2.1 Non-discrimination and oppression

Etra does not accept discrimination, threats, oppression, or harassment in any form.

### 2.2 Child labor or forced labor

Etra shall not use child or forced labor under any circumstances, or enter into a contract with subcontractors or suppliers using such labor.

### 2.3 Social conditions

Etra shall support and respect internationally declared human rights. We are committed to treating our employees fairly, equally, and with respect.

### 2.4 Freedom of association

Etra shall respect our employees' right to freely associate and bargain collectively in compliance with all applicable laws and regulations.

### 2.5 Wages and working hours

Etra shall ensure that compensation paid to our employees complies with all applicable wage laws, including those relating to minimum wages, overtime hours, and mandatory benefits. Working hours must comply with national legislation and agreements.

### **3. Health and safety**

Etra shall provide our employees with a safe and healthy working environment in compliance with all applicable laws and regulations. Appropriate health and safety information, training, and equipment shall be provided to all employees.

Etra shall ensure that effective safety programs are in place covering human safety, emergency preparedness and exposure to harmful or dangerous chemicals and biological substances. Employees shall not be under the influence of alcohol or illegal drugs while working for Etra or on Etra's behalf.

Etra shall comply at all times with all the applicable laws and regulations related to health and safety. This includes providing employees with, for instance, appropriate personal protective equipment and first-aid equipment in all areas. Employees shall never be disciplined for raising safety concerns or for refusing to work in an unsafe environment. Clear procedures shall be in place to identify, manage, record, and report occupational injuries and illnesses appropriately. Etra shall implement corrective actions to eliminate the root causes of injuries and illnesses. Where hazardous substances are used, relevant supervision controls and emergency plans shall be provided.

### **4. Environment**

Etra shall engage in all reasonable efforts to protect the environment, and to minimize the impact of our activities and products on the environment. Etra shall obtain, maintain and comply with all environmental permits, licenses and registrations necessary for our operations.

Etra shall actively strive to reduce emissions into the air, soil and waterways, and to optimize resource management. Etra shall also adhere to all applicable environmental laws and regulations regarding the prohibition or restriction of specific substances, including labelling for recycling and disposal.

Etra encourages all our suppliers to determine the carbon footprint of their products and services and to take action to reduce it.

### **5. Compliance and enforcement**

By agreeing to this Code of Conduct, the Supplier confirms that they comply with all the terms stated here. The Supplier shall also take steps to ensure that their own suppliers comply with these terms.

### **6. Reporting of Violations**

Any violations of the principles set forth in this Code of Conduct shall be reported to Etra. The Supplier can report violations directly to their contact at Etra sourcing.

### **7. Questions**

Questions concerning this Code of Conduct shall be directed to your contact at Etra sourcing