

**normet**



# NORMET CODE OF CONDUCT

2.12.2019  
Version 2

Dear Colleagues,

Maintaining high ethical standards within our company and in our relationships with customers, suppliers and other business partners is key to our long-term success. Strong regulatory compliance has become an important concern of our customers and other stakeholders. Our good reputation in these areas requires continuous effort and a high level of integrity in everything we do. Any violation of our ethical standards could seriously damage our reputation.

The Normet Code of Conduct contains a summary of the fundamental principles and guidelines of responsible business conduct and ethical behavior that applies to all us working in Normet.

I strongly believe that doing responsible business is the only way to succeed. One of the areas that I am particularly passionate about is Environment, Health and Safety. We have a shared responsibility to make sure every one of us goes home safe every day. Similarly, we have a shared responsibility to operate in compliance with all laws and to have high ethical standards across our business. Our license to operate depends on maintaining the highest standards in safety, compliance and business ethics. We cannot compromise this even in the toughest situations that we face in our work.

We operate in multiple jurisdictions and regulatory environments and employ personnel from a variety of cultures. This brings us great benefits as a company, but we also acknowledge the challenges that come with it. Compliance with applicable laws, wherever we operate, is always the minimum standard for us. Our Code of Conduct supports this by providing the fundamental principles and practical guidelines that we are committed to follow.

The ultimate responsibility for maintaining our ethical standards rests with every one of us and I therefore expect that we all read the Code of Conduct, participate in the training that is provided and ensure that the Code of Conduct becomes the basis of our daily work.

Best regards,

A handwritten signature in blue ink, appearing to read 'Ed Santamaria', with a stylized flourish at the end.

Ed Santamaria

President and CEO

## **1. General**

### **1.1 Introduction and Objectives**

This Code of Conduct is a statement of good practice intended to give guidance on business conduct and ethical behaviour for all Normet employees.

Compliance with applicable laws and regulations is always the minimum standard for us. The Code of Conduct supports and complements this and provides the fundamental principles and practical guidelines that Normet is committed to follow.

The Code of Conduct aims to protect Normet's business, assets and goodwill against corrupt and fraudulent practices. Equally importantly, it exists to help employees avoid making wrong choices or decisions that could also give rise to personal liabilities or consequences.

This Code of Conduct is not exhaustive but is complemented by Normet's global and local policies defining the detailed procedures and responsibilities. Such policies must always be aligned with this Code of Conduct.

### **1.2 Applicability**

This Code of Conduct is applicable to and mandatory for all Normet Group companies and their employees. Each company and employee is responsible for complying with applicable laws and regulations and the Code of Conduct.

No manager is authorised to direct an employee to commit an unethical or illegal act. Hence, no one can justify such an act by saying that it was directed by someone in a superior position. Normet is fully committed to supporting all its employees in complying with this Code of Conduct.

### **1.3 Violations of the Code**

Any employee who violates the Code may be subject to appropriate disciplinary action. This may include, but is not limited to, an oral or written warning, withdrawal of existing benefits temporarily or indefinitely, or suspension or termination of employment. Where an action is also in breach of the law, the employee may be subject to prosecution under civil or criminal law.

If an employee's violation exposes Normet to a third-party claim and subsequent liability, Normet may seek appropriate compensation for the damage from the employee in question by all legal means at its disposal.

## 1.4 Raising Concerns

Employees should voice their genuine concerns about matters which they believe may violate this Code of Conduct, without fear of retaliation or adverse consequences. Concerns relating to the Code of Conduct may be reported anonymously, although all employees are encouraged to disclose their identity upon contact.

To ensure that appropriate action is taken, local procedures can be followed or one of the following persons contacted: the employee's immediate supervisor, the Regional Vice President, a member of the Normet Leadership Team or the Legal function.

The above procedures are operated under strict confidentiality. Normet will not tolerate any action or retaliation taken against any person reporting a genuine suspicion of misconduct in good faith.

To report misconduct, you may choose any of the following communication channels:

1. Your immediate supervisor
2. Other members of the Normet management
3. The whistleblowing channel: <https://normet.ilmoituskanava.fi/>
4. Normet's Legal function

## 2. Health and Safety

Protecting the health, safety and lives of everyone who works at or visits Normet's premises is a primary responsibility of Normet. Normet believes that all accidents can be prevented and is committed to a goal of zero accidents. Normet's occupational health and safety policies and practices are applicable throughout the company. As a minimum, Normet complies with all relevant legal and workplace safety requirements.

Employees are required to raise any concern they have regarding workplace health and safety as a matter of the greatest urgency with their immediate supervisor or another manager responsible for the area to which the concern relates.

## 3. Doing Business Responsibly – Conflicts of Interest

All Normet employees are expected to work in a way that promotes the best interests of Normet. Participating in any activity outside Normet should be clearly separated from activities related to Normet employment and should not adversely affect work performance for Normet. Employees must disclose any actual or perceived conflict of interest with Normet.

A conflict of interest arises when an employee's personal interests or opportunity for gain or profit are, or could be interpreted as being, in conflict with those of Normet. Such personal interests can arise, for example, when the employee has outside affiliations, employment, an investment or other financial interest in another company. These interests include those of closely connected persons, such as immediate family members or other relatives and persons with whom the employee has close personal relationships.

Involvement in non-profit or charity organisations is normally not regarded as a conflict of interest.

Employees are free to engage in outside activities that do not interfere with the performance of their job or otherwise conflict with Normet's interests. Notwithstanding the above, Normet expects its employees to behave ethically even outside their working hours.

## **4. Dealing with Customers, Suppliers and the Community**

### **4.1 Combating Corruption**

Normet is strongly committed to preventing all forms of corruption and complies with the anti-corruption treaties and laws of the countries in which it does business. Offering or accepting bribes or kickbacks is strictly prohibited and never in the interest of Normet. These requirements apply to both Normet's employees and its agents, distributors, consultants and service providers, no matter where they are doing business.

Special care should be taken in dealing with governments and their related local, regional and national agencies. No gifts, payments, or inducements of any kind should be made, directly or indirectly, to government or public officials.

It is also absolutely forbidden for Normet employees to seek or accept payments or favours for awarding of contracts, offers of employment or other such advantages.

### **4.2 Dealing with Customers**

Normet's success or failure is decided by its customers.

It is essential that Normet develops and maintains mutually good long-term commercial relationships with its customers. This requires that we continually improve customer satisfaction by focusing on both product and service quality by complying with our quality processes and safety requirements.

Product promotion and advertising must always be truthful, accurate and presented in a fair way. Making untrue comments about competitors or their products is prohibited.

### 4.3 Dealing with Suppliers

Suppliers are key stakeholders in the success of Normet's business. They are expected to provide Normet with value for money by being quality-driven, innovative and efficient. Normet's purchasing decisions are made solely based on the Normet Group's best interests. In return, Normet strives to be a good partner to its suppliers by acting in a fair and honest manner.

Normet's suppliers are expected to operate in accordance with the applicable laws and good ethical practices. Normet encourages its suppliers to abide by this Conduct of Conduct or maintain similar ethical standards, including those relating to human rights, the environment, and occupational health and safety.

### 4.4 Export Controls and Sanctions

Export control laws and regulations and imposed sanctions aim at exerting pressure on the individuals, countries and international organisations targeted by the sanctions. Normet respects and is committed to compliance with applicable export control regulations and imposed sanctions. All Normet employees involved in trade or export activities should always assess the nature of the goods, destination country, end use and identity of the customer/business partner.

### 4.5 Gifts, Contributions, Donations and Sponsorship

**Gifts:** It is occasionally necessary, proper and desirable to give or accept modest gifts and hospitality from customers or suppliers. Gifts, favours or hospitality may be acceptable if, for example, they are consistent with customary business practices, are not excessive in value or inappropriately frequent and cannot be construed as a bribe, and are not in the form of cash, shares or similar instruments. All expenditure on gifts should be recorded as such in the company's records. Any doubt about the appropriateness of a gift or hospitality should be discussed with the employee's immediate supervisor, a member of Normet senior management or Normet's Legal function.

**Political Contributions:** Normet does not take part in or otherwise support political activities. As a general rule, Normet does not make contributions, directly or indirectly, to political parties, their affiliate organisations or individuals holding or seeking political office.

**Charitable and Community Donations:** Donations should not be tied or give the appearance of being tied to the execution of a business transaction or governmental action. Serious consideration should be given to the appropriateness of each donation and the effect on Normet's reputation.

**Sponsorship:** Normet has tight control over sponsorship of sport and cultural activities. Sponsorship is managed by the Normet Group Marketing function. Sponsorship should always be part of general marketing operations and aim to reliably promote the company's reputation in the local community.

## **4.6 Competition and Antitrust Legislation**

Normet strongly believes in operating in a free and open market and is fully committed to complying with the applicable antitrust and competition legislation.

No company or its employees may engage in any form of communication, whether written, electronic or verbal, with a competitor which has the effect or purpose of restricting competition.

If there is any element of doubt whatsoever regarding the appropriateness of any communication, contract or commercial strategy in the context of competition, employees must contact Normet's Legal function for further advice.

Any breach of this policy poses a risk of serious financial penalties for Normet. In addition, the persons responsible for the action may face civil or criminal liability.

## **4.7 Environment**

Normet considers its environmental responsibilities absolutely critical to its long-term success and is committed to complying with all relevant legislation and adhering to the industry's best practices. Normet's practices include optimising the use of energy and resources and being good neighbours in the communities in which Normet operates. Normet's employees and contractors should respect their environmental responsibilities.

## **4.8 Communications and Media**

Communications with the outside world play an important part in managing Normet's reputation, brand image and business goodwill. Normet will at all times provide fair, accurate and honest information to the public.

All communications to the media relating to Normet's financial performance, acquisitions, disposals and any matter that could have a reputational impact on Normet will be handled exclusively by persons nominated by the President and CEO of Normet.

# **5. Safekeeping of Assets and Business Goodwill**

## **5.1 Safekeeping of Assets**

All Normet employees have the responsibility to protect the company's assets and resources and to ensure that they are used only for their designated purpose and in a proper manner. Such assets may include company money, products, intellectual property, tools and machines, computers, telephones and other electronics, vehicles, as well as employees' time at work and their work product.

## 5.2 Prevention of Fraud and Money Laundering

**Fraud:** Fraud is intentional deception or illegal, unethical, dishonest or improper conduct intended to result in financial or personal gain, profit or advantage. Engaging in fraud in any way or failing to report fraud is a fundamental breach of the Code of Conduct.

**Money Laundering:** Individuals or organisations involved in criminal activities, such as drug or human trafficking, counterfeiting, tax or customs fraud, frequently seek to use legitimate businesses as channels to launder their illegally acquired funds. All Normet employees must act diligently to ensure that Normet is not used as a vehicle to launder money. This requires that we know our business partners and carry out the necessary background checks before entering into contracts or transactions with new customers, suppliers or other counterparties.

## 5.3 Accounting and Records

Individual Normet companies must ensure that their accounting functions operate to the highest standard and that accounting records are maintained in accordance with local legislation, relevant accounting standards and Normet guidelines. Records, in written or electronic form, must be kept secure.

## 5.4 Confidential Information and Data Protection

**Confidential Information:** An employee may acquire confidential information, such as trade secrets, processes, policy and procedure manuals, marketing plans, sales information, customer lists or information, pricing information or financial data. Such information may be used solely for the benefit of Normet and must not be disclosed to anyone, except when disclosure is legitimate for business purposes.

**Data Protection:** Through its operations, Normet has access to and stores data in both written and electronic form, including data relating to customers, suppliers and personal information on individuals including past and present employees. All collection, storage and transmission of data must be conducted in consideration of data privacy and always in compliance with applicable laws and regulations.

# 6. Fair and Respectful Treatment of Employees

## 6.1 Human Rights

Normet is fully committed to human rights. It supports the applicable principles set out in the articles of the United Nations Universal Declaration of Human Rights.

Normet believes that all individuals should be treated equally and fairly irrespective of ethnic origin nationality, religion, political views, gender, sexual orientation or age. Normet honours human dignity, promotes diversity and condemns discrimination, harassment and intolerance of any kind.

Any employee who feels that he/she is a victim of discrimination, harassment or intolerance of any kind should immediately report the matter to his/her immediate supervisor or Normet Human Resources.



## **6.2 Human Resources and Employment Policy**

Normet's human resources practices should always be compliant with local legislation, customs and practices as well as international labour standards.

Our recruitment and employment practices must conform to all relevant laws and conventions. While merit should be the ultimate basis for decisions, it must be ensured that the principle of equal opportunity is applied.

## **6.3 Drugs, Alcohol and Other Substances**

The use of alcohol, illegal drugs or medication may seriously affect a person's ability to do their job in a proper and safe manner. The misuse of medication, illegal drugs, alcohol or controlled substances in the workplace is absolutely prohibited. Employees must be aware that the use of alcohol or other comparable substances may adversely affect their insurance coverage in the event of occupational injury or death. The consumption of alcohol on Normet premises is not allowed unless specifically authorised by the management.



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