

Distribution

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Supplier Code of Conduct

Responsible and ethical business conduct is a fundamental part of Elvera's operations. Our suppliers and partners are an essential part of our value chain, and we expect them to comply with high ethical standards, applicable legislation, and good health safety and environmental safety practices.

This Supplier Code of Conduct defines the minimum requirements that we expect from all our suppliers and subcontractors. It provides the foundation for trustworthy, safe, and sustainable cooperation throughout the supply chain. We also require our suppliers to ensure that their own suppliers commit to similar principles.

We believe that responsible conduct supports long-term success and the achievement of shared goals. These ethical principles are closely aligned with Elvera's values:
Together – With Humanity – Courageously – With Professional Pride

Compliance with Laws, Regulations and Initiatives

The supplier shall comply with all applicable laws, regulations, and official requirements, as well as national and international agreements relevant to its operations. This obligation applies particularly to labour law and collective agreements, environmental legislation, occupational health and safety requirements, financial regulations, and contractor liability obligations.

The supplier shall respect and comply with internationally recognized human rights, including those set out in the United Nations Universal Declaration of Human Rights, the fundamental rights defined by the International Labour Organization, and the United Nations Guiding Principles on Business and Human Rights.

Elvera is committed to the United Nations Global Compact and promotes its principles relating to human rights, labour standards, environmental responsibility and anti-corruption. Suppliers are required to act in accordance with these principles in their own operations.

The supplier shall ensure compliance with all applicable international sanctions. The supplier must confirm that no sanctions apply to the supplier itself, its management, owners, or subcontractors, and must immediately inform Elvera if any such sanctions are imposed.

Principles of Business Conduct

The supplier shall ensure the protection of confidential information and comply with all relevant data protection and information security legislation. All confidential and personal data must be processed lawfully, securely, and in an ethical manner. The supplier is expected to implement appropriate technical and organizational measures to safeguard information and support risk management, continuity, and incident handling in accordance with applicable requirements, including those related to cybersecurity.

The supplier shall ensure that its products and services meet high quality standards and support continuous improvement. Operations shall be based on proactive risk management, clear procedures, and compliance with agreed instructions and schedules.

Elvera operates certified management systems in accordance with ISO 9001, ISO 45001, and ISO 14001 standards, and its information security practices are aligned with ISO 27001. By accepting this Code, the supplier commits to operating in accordance with these principles and related requirements.

Elvera conducts due diligence assessments to ensure that suppliers meet requirements related to responsibility, legality, and ethical business conduct. The supplier shall cooperate in these assessments and, where necessary, implement corrective actions within a reasonable timeframe. Suppliers are also encouraged to carry out corresponding due diligence within their own supply chains.

Anti-Corruption and Fair Competition

The supplier shall conduct its business with integrity and transparency and comply with all applicable competition and antitrust laws. All forms of corruption, including bribery, extortion, and embezzlement, are strictly prohibited. The supplier shall ensure that its management, employees, and representatives do not engage in corrupt practices and that appropriate controls and procedures are in place to prevent such conduct.

The supplier shall identify and avoid conflicts of interest. Any relationships that may create a conflict of interest, particularly those involving Elvera employees in decision-making roles, must be disclosed without delay. The supplier is expected to maintain reliable and up-to-date information within applicable compliance programs.

The offering or acceptance of gifts or benefits intended to influence business decisions is strictly prohibited. Any suspicion of bribery or unethical conduct must be reported and will be investigated accordingly.

Respect for Human Rights and Labour Conditions

The supplier shall respect internationally recognized human rights in all its operations and promote their realization. Forced labour in any form is strictly prohibited. The supplier must not engage in practices such as withholding personal documents, imposing debt bondage, or applying coercion, punishment, or inhumane treatment.

Child labour is not permitted under any circumstances. The supplier shall ensure that all employees meet the legal minimum working age requirements, and that work performed by young persons does not harm their health, development, or education.

The supplier shall comply with all applicable laws concerning wages, working hours, and benefits. Employees must receive fair compensation consistent with applicable standards and legislation, and working hours must comply with legal limits and rest requirements.

All employees shall be treated equally, respectfully, and fairly. Discrimination, harassment, bullying, or any form of inappropriate conduct is strictly prohibited. Employment-related decisions must not be based on personal characteristics such as gender, age, nationality, religion, or other individual factors.

The supplier shall respect the right of employees to freedom of association and ensure appropriate processes are in place to identify, prevent, mitigate, and remedy human rights violations within its operations and supply chain.

Health, Safety, and Working Conditions

The supplier shall provide a safe and healthy working environment and comply with all applicable occupational health and safety legislation. Preventive measures shall be taken to minimize workplace accidents and occupational illnesses, including the provision of appropriate personal protective equipment and the implementation of safe working practices.

The supplier shall identify, assess, and manage risks in the working environment and take corrective actions without delay. Risk assessments must be conducted before work begins and updated continuously as work progresses. Employees shall be properly trained, qualified, and prepared to respond to emergency situations.

The supplier shall ensure compliance with all safety requirements related to hazardous work and follow applicable legislation and instructions for specialized tasks. Employees must not work under the influence of alcohol or drugs, and the supplier shall implement preventive measures related to substance abuse.

Environmental Responsibility

The supplier shall comply with all applicable environmental legislation, permits, and regulatory requirements. The supplier shall actively work to minimize negative environmental impacts by

managing waste responsibly, improving energy efficiency, reducing emissions, and promoting the sustainable use of natural resources.

The supplier shall consider biodiversity, climate change impacts, and transparency requirements related to raw materials, including conflict minerals. Suppliers are encouraged to set and monitor targets for reducing greenhouse gas emissions and to continuously improve environmental performance.

Supplier Evaluation and Compliance

As part of supplier management, the supplier shall participate in self-assessments upon request and at regular intervals during the cooperation. Failure to comply with requirements or to address identified deficiencies may result in the termination of the business relationship.

Elvera and its authorized representatives have the right to audit the supplier's compliance with this Code. The supplier shall cooperate in audits and provide necessary information. Any violation of this Code, applicable legislation, or ethical principles may result in immediate termination of contracts and cooperation.

Reporting Misconduct

The supplier shall report any suspected violations of this Code or applicable laws without delay. Reports will be handled confidentially, and individuals reporting concerns will be protected from retaliation. Anonymous reporting channels may be used when available.

Failure to report known violations may also constitute a breach of this Code and lead to consequences.

Final Provisions

This Supplier Code of Conduct has been approved on 13 May 2026 and is subject to regular updates. The supplier shall comply with the current valid version and ensure that adequate resources are allocated to meet its requirements.

Acceptance of this document may be made by signing it as part of a contract or by approving it electronically through Elvera's supplier system.

Ilari Jaakkola

Ilari Jaakkola, CEO
Elvera Oy