



# CODE OF CONDUCT

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## FROM THE CEO

**OUR GOAL** is to be a leading technology supplier for the engine, machine and vehicle industries. We provide our customers with innovative, high-quality solutions and services that help them develop products that protect the environment and human health by improving energy efficiency and reducing hazardous emissions.

We consider people, the environment and future generations in everything we do. Our vision is zero emissions. We will meet our goals by recruiting and retaining the best talent in the industry and working as a team. We are living in an evolving environment in the midst of climate change and the green transition. This requires every Proventia employee and business partner to adhere to ethically acceptable principles and corporate responsibility in all our business operations.

This Code of Conduct defines the rules we play by, and the expectations we place on all Proventia's employees in their daily duties.

We encourage all Proventia stakeholders to familiarise themselves both with this Code

of Conduct as well as Proventia's specific policies and operating instructions pertaining to their activities.

We are all responsible for complying with our Code of Conduct and promoting corporate responsibility in all Proventia's activities. Negligence by even a single person may put our work as a whole in jeopardy. We want every Proventia employee and stakeholder to feel proud of working sustainably with Proventia and fostering a cleaner tomorrow in a responsible manner.

Oulunsalo, November 4, 2022



Jari Lotvonen  
CEO  
Proventia Group Oyj, Proventia Oy



## CUSTOMER RELATIONSHIPS

**IN ACCORDANCE** with our value “Customers first”, the success of our customers is key to our own success. We deliver on our promises.

We operate globally and commit to our customers in the long term, so that we can continuously both meet and exceed the expectations they place on us. Proventia’s objective is to be the preferred supplier for our existing and new customers. We will reach this objective by strengthening our customers’ competitive advantage and success with solutions developed by us.

Mutual trust is built on communication that matches the actions and vice versa. We are a transparent, reliable and innovative partner. We require our customers to operate in the same way, since transparency and honesty are prerequisites for successful cooperation.



# ENVIRONMENT

**PROVENTIA'S SOLUTIONS** enable cleaner air on all continents – for us all. We help our customers develop solutions that promote the health of humans and the environment.

We follow the principle of continuous improvement to develop the processes and products so as to mitigate environmental impacts. We operate in compliance with the law and other environmental regulations, but regulatory requirements are just the bare minimum for us. We develop our activities through determined environmental management develops to be even more environmentally friendly, among other things through clear environmental processes and regular environmental audits.

Proventia is committed to environmental responsibility, and it takes the impact on the environment into account in all business-related decision making.

## Working environment

At Proventia, we work today for a cleaner tomorrow, as a team.

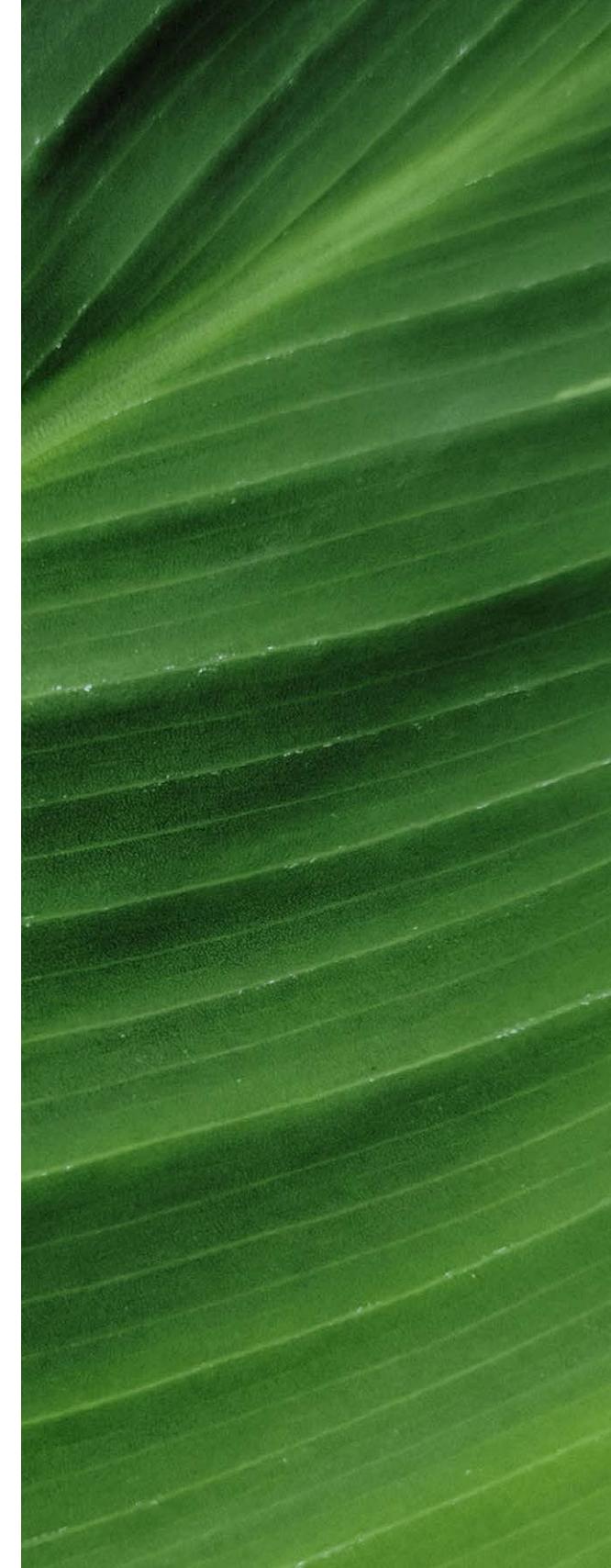
We are an international, equal and non-discriminatory work community. We care for each other and see diversity as a strength for our company. We care for the mental and physical well-being of our employees, since skilled personnel are Proventia's most important resource. Everyone's work input is an important part of the customer's solution.

We are committed to social responsibility and thereby to providing everyone with equal opportunities in our work community, as reflected in our work-related practices and policies. We provide a discrimination-free working environment where diversity is valued with no regard to gender, ethnic or national origin, religion, age, physical attributes or other diversity-related matters. We believe that diversity and the equal treatment of everyone strengthens our operation.

We do not allow any kind of harassment, abuse or bullying. Any straying from these principles will be taken seriously and handled appropriately.

We are committed to securing the health and safety of personnel in the workplace. Our entire personnel are responsible for protecting themselves, their colleagues, workplace, community and the environment. Each of us must report potential shortcomings or problems related to occupational health and safety as well as prevent any damage. Through our product development and quality assurance, we also want to prevent the occupational health and safety risks associated with the use of our products and services.

We respect our personnel's freedom of association. As a company, Proventia has no political or religious affiliation and does not support the activities of any political or religious organisation.



## SUBCONTRACTOR AND SUPPLIER RELATIONSHIPS

**SUBCONTRACTORS AND** suppliers are an essential part of our supply chain. We select our business partners with care and based on objective criteria, such as quality, trustworthiness, delivery reliability, sustainability, and price. We will not let personal factors influence our decisions. We expect our subcontractors and suppliers to comply with Proventia's Code of

Conduct in their business activities and to otherwise operate as a responsible business. This requires that they comply with the national legislation in their countries of operation as well as international regulations and practices concerning human rights and environmental issues.



## GENERAL BUSINESS PRINCIPLES

### Adherence to corporate responsibility

Responsibility is part of our daily activities. We want to be a good corporate citizen in all our areas of operation. In addition to national and international laws and regulations, we follow our Code of Conduct.

We value openness and integrity in business operations. We acknowledge that taking

the economy, environment and society into consideration as a whole lays the foundation of sustainable business operations.

As Proventia operates in different countries and has suppliers worldwide, our operations are covered not only by national legislation and agreements, but also by numerous international conventions and recommendations.

### We comply with the following international declarations and conventions:

- The UN Universal Declaration of Human Rights and the UN Convention of the Rights of the Child
- UN Guiding Principles on Business and Human Rights
- ILO Conventions on Fundamental Principles and Rights at Work
- The OECD Guidelines for Multinational Corporations
- The UN Global Compact initiative
- The UN Sustainable Development Goals

# CONFLICTS OF INTEREST

**WE REQUIRE** that Proventia’s personnel and members of the board of directors operate in the best interests of the company, without overlooking corporate responsibility. Situations where one’s personal interests may be in conflict with Proventia’s interests must be avoided. We will handle any conflicts of interests openly, and act in line with the company’s long-term interests and proper corporate governance.

Business relationships should not be used to pursue personal benefits. Proventia’s

personnel may not accept from current or potential business partners any gifts, payments, hospitality or services, which can reasonably be considered to impact business operations or which go beyond the boundaries of regular hospitality. Offering, giving and soliciting such gifts, payments, hospitality or services is prohibited.



# INFORMATION, PROPERTY AND THEIR PROTECTION

**PROVENTIA’S ASSETS** consist of tangible property and intangible information. Proventia as well as its stakeholders and shareholders count on us at Proventia to protect the company’s assets in all circumstances.

We respect industrial property rights and are committed to applying technology and competence in a manner that protects them. We also respect the assets of our company and do not seek personal benefits by taking advantage of Proventia’s assets, information or position.

We protect confidential data, including information that subcontractors and suppliers, customers and other partners have entrusted to us. Likewise, we tend to the protection of personal data and process data on Proventia employees responsibly and in accordance with legislation. We comply with different countries’ laws and regulations on the confidentiality of information.

## FAIR COMPETITION

**WE RESPECT** the regulations concerning free and fair competition and are committed to complying with valid legislation on cartels and other competition legislation. This applies to our general behaviour in the mar-

ket as well as situations which may involve problems concerning competition legislation. These include contacts with competitors, information exchange and activities in industry organisations.

## COMMUNICATION AND CONTACTS WITH STAKEHOLDERS

**PROVENTIA KEEPS** in touch with its stakeholders by means of open communication and dialogue. We maintain stakeholder relations with integrity and in a fair and confidential manner.

Proventia works in cooperation with the authorities and local, national and international regulatory bodies.

### Problems and whistleblowing

Proventia does not condone activities that are contrary to its Code of Conduct or practices, or legislation.

We encourage our employees and stakeholders facing a challenging situation or decision to reach out for advice. In these situations, you can always contact your supervisor, a designated contact person or their supervisor.

Please report any observations without delay to your supervisor, the HR department or Proventia's management. Any deviations will be examined and handled with due regard to the principles of reasonableness, proportionality and personal protection.

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