



Alteams Code of Conduct

The purpose of Alteams' Code of Conduct principles is to create a common basis for responsible business activities, and to promote a sound way to do business throughout the entire Alteams. It is designed to preserve Alteams long tradition of integrity and credibility with customers, suppliers and within the organization. These guidelines together with Alteams Values are the basis for Alteams corporate culture and method of operating.

These principles ensure that we remain a reliable partner with our customers and other interested parties. We are committed to comply with domestic and international laws and regulations, as well as generally approved working methods. In some countries stricter and more detailed rules can apply. However, they must not conflict with Alteams operating principles.



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1. Introduction

This Code of Conduct establishes the standards and principles for ethical conduct that apply to all members of the Alteams and its subsidiaries, which includes staff, interns, board members and others who have been entrusted to act on behalf of or in the name of Alteams. All members of Alteams are guided by these standards and principles and are expected to use their best efforts to adhere to them in conducting activities on behalf of Alteams.

2. Compliance with laws and other regulations

Local and international laws are respected and Alteams is committed to full compliance with all applicable laws and regulations of relevant countries and regions.

3. Health, safety and environment

Alteams does not accept actions or working conditions that do not comply with the international agreements or international working practices. Alteams organizes for each employee a safe work environment and performs risk analysis and continuously monitors and develops work safety and occupational safety related issues.

Alteams believes that we have a responsibility to care for and protect the environment in which we operate. Alteams is fully committed to improving environmental performance across all of our business activities, and will encourage business partners and members of the wider community to join us in this effort.

Alteams has recognized key objectives to be in the areas of:

- To continuously develop work practises to achieve zero-incidents.
- To improve material usage efficiency and to reduce waste.
- To enhance energy efficiency (kWh/Al kg).
- To reduce total CO2 emissions by 50% from 2019 baseline by 2030.

Each Alteams manufacturing site have their environmental permits and these are reviewed annually. More information can be found from Alteams EHS Policy.

4. Human rights

Alteams fully respects UN human rights and complies with ILO (International Labor Organization) regulations concerning basic working rights: freedom to associate, collectively gather, collectively agreed working conditions, the prevention of forced labor as well as fairness regarding equality at work.



Alteams under no circumstances accepts any use of child labor and ensures that its partners follow the same. The minimum age for employment is 15 years for regular, nonhazardous work and 18 for hazardous work, though local and national laws take precedent if stricter.

Alteams does not engage subcontractors or suppliers that accept child labor.

Alteams does not allow behavior that is threatening, abusive or exploitative. Alteams encourages its personnel to motivate itself with various methods.

With these actions we promote equality and motivate our employees towards this.

5. Conflicts of interest, gifts and prevention of bribery

Conflict of interest arises when a person participates in a decision about a matter (including any contract or arrangement of employment, leasing, sale or provision of goods and services) which may benefit or *be seen to* benefit that person because of his/her direct or indirect monetary or financial interests affected by or involved in that matter.

It is the duty of any person taking part in the operations of Alteams to always adhere to the conflict of interest policy as follows. In the event of such matter arises, the person shall formally disclose the interest, refrain from attempting to persuade or influence other persons participating in the decision, and shall not cast any vote on the matter.

Neither Alteams nor any of its employees are to offer bribes or illegal payments to authority representatives or other parties in securing or maintaining business. We do not give to or receive from business partners gifts that exceed the accepted Alteams level, which is set at 100 euro / 1000 CNY / 500 PLN. However, local laws apply, if they are stricter. In case gifts given by Alteams exceed the limit of 100 € / 1000 CNY / 500 PLN. it can be accepted by Alteams Oy CEO approval. By CEO's approval maximum limit of the gift is 500 € / 4000 CNY / 2000 PLN. If clarification is required concerning such issues, especially potential conflict of interests, please consult with the management beforehand. This applies with all other possible conflicts of interests.

6. Care and use of the confidential information

Alteams respects the confidence and privacy of its customers' and stakeholders' personnel data and product information. Alteams employees may also become aware of confidential information about Alteams business. Alteams employee should not use improper means to acquire confidential information.

Any disclosures to third parties directed by Alteams shall be subject to the respective third party having signed a non-disclosure undertaking before the delivery of confidential information.



7. Competition and fair business

The purpose of competition law is to protect consumers and businesses from unfair business practices. Every Alteams employee must comply with those laws. Any activities such as participation in a cartel, abuse of a dominant position in a market place, or the exchange of price or other commercial information between competitors is prohibited. Alteams employees must pay attention to competition issues especially in situations where competitors or potential competitors may be present.

8. Suppliers

For Alteams it is crucial to co-operate with suppliers who provide the Goods and/or Services in compliance with all relevant laws, regulations, and codes of practice. In addition, the supplier must strictly comply with all agreements between Alteams and the supplier, including but not limited the supply agreement and the non-disclosure agreement.

The supplier and its subcontractors must comply with the Supplier Code of Conduct issued by Alteams to its suppliers regarding social and environmental responsibility. Alteams expects its suppliers to comply with the requirements of such Code of Conduct with respect to Alteams, their own employees and suppliers, as well as third parties, including authorities. Alteams cooperates only with suppliers who are committed to comply with this Code of Conduct.

9. Alteams values

Alteams values have been defined to fit into and further specify the code of conduct into daily life.

These values guide each Alteams employee, on how to work together and how to behave. Each Alteams member shall commit to these values:

- People are our key to success
- High quality attitude
- We keep what we promise

We are committed in our attitude towards excellent quality and customer service, because we want to be ranked as the best in our business. Quality is not just another goal, it is our basic strategy for success and future growth. More info can be found from Alteams Quality Policy.



10. Implementation

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The content of the Code of Conduct is provided in different internal events. The Code of Conduct is part of new employee induction and is also available at Alteams web pages (www.alteams.com).

If someone notices violations of these ethical principles, he/she is to contact first his/her own superior or the next level of management. It is responsibility of the informed superior to address the violations.

This code of code is valid as of March 2017.

11. Reference documents

1. Alteams EHS Policy
2. Alteams Quality Policy
3. Alteams Supplier Code of Conduct



Revised history of document

Rev.	Issuing date	Revised contents	Author	Approved by
1	2017.03.03	New Document	Mika Haapala	Asko Nevala
2	2017.04.12	Customers included	Mika Haapala	Asko Nevala
3	2017.09.14	Gift limits updated	Mika Haapala	Asko Nevala
4	2018.5.25	EHS part updated based on revised EHS policy	Mika Haapala	Asko Nevala
5	2021.5.7	Suppliers section updated based on Supplier CoC	Anne-Mari Järvinen	Asko Nevala
6	2021.5.17	Competition and fair business added	Anne-Mari Järvinen	Asko Nevala