



# **SOL's CODE OF CONDUCT**

## 1. Commitment to the Code of Conduct

This Code of Conduct applies to the Board members, management and employees of all SOL Group companies (hereinafter referred to as "SOL"), regardless of their position or duties (hereinafter referred to as "SOL employees").

SOL conducts business with high ethical standards and requires all SOL employees to act in accordance with this Code. The Code of Conduct supplements the current legislation and is part of SOL's responsibility efforts. Each SOL employee is responsible for playing by the rules. Supervisors are responsible for ensuring that employees are properly introduced to this Code and that it is consistently followed within their area of responsibility.

SOL requires all its suppliers to comply with the Supplier Code of Conduct drawn up by SOL. The Supplier Code of Conduct applies to all suppliers that provide SOL with products, services, work or other similar activities.

SOL's operations are guided by values that emphasise economic, social and environmental responsibility. Each SOL employee must comply with our values in their work: Sunny and satisfied customers, the joy of working, everyday creativity, enterprising spirit and reliability. At SOL, we believe that everyone wants to do their job well and succeed in their work. We encourage independence and responsibility.

SOL values its customers and other stakeholders. SOL's vision is to be a superior partner to our customers and to provide them with positive experiences. Every SOL employee must act responsibly, respectfully and honestly in relation to customers and other stakeholders and comply with this Code in everything they do.

In its operations, SOL recognises the following principles to which SOL and its suppliers are committed: international conventions, such as the Universal Declaration of Human Rights, key UN conventions, UN Guiding Principles on Business and Human Rights, International Labour Organisation's (ILO) conventions and recommendations. SOL is committed to the UN Global Compact initiative and its ten principles related to respecting human rights, labour rights, the environment and combatting corruption. SOL also contributes to the UN's Sustainable Development Goals (SDGs).

## 2. Compliance with legislations

SOL and SOL employees comply with all applicable laws and in act accordance with current generally accepted business practices.

SOL employees must notify their own supervisor if

they become aware of activities that violate legislation. It is the supervisor's responsibility to take appropriate actions to remedy the matter without delay. At SOL, supervisors must ensure full compliance with legislation and good business practices in the supervisor's area of responsibility.

## 3. Prevention of corruption and bribery

The corruption and bribery ban permeates all SOL operations. SOL and SOL employees may not make or offer bribes or unlawful payments to customers, supervisors, authorities or other parties to gain or retain business, or for any other reason. Before offering a gift or benefit to a partner, employees must ensure that they are aware of the rules and ethical guidelines observed by the recipient to prevent bribery.

SOL employees may not accept personal benefits or gifts from stakeholders, suppliers or other parties which run contrary to legislation and/or business practices. Benefits or gifts may only be accepted if: They are offered in the context of regular business activities, and they are ordinary, reasonable and low in monetary value. Gifts or benefits exceeding a value of EUR 100 offered to a SOL employee must be authorised by a Service Director, Regional Director, Business Director or Managing Director.

A benefit may not be given or accepted if it exceeds normal and reasonable business practices, is contrary to SOL's interests or values, could affect or appears to affect the independence or impartiality of a party to a business relationship, is likely to raise doubts about the giver's motives or the effect of the transaction on business decision-making or profit.

In the event of uncertainty regarding the appropriateness/lawfulness of giving or receiving a gift, it must be declined. As a general rule, SOL will cover the costs of its own employees for any travel related to events and travels organised by external parties.

SOL and SOL employees may not give or receive Kickbacks, recruitment fees or other similar illegal payments related to recruitment or the employment relationship. SOL forwards all suspected misconduct related to the aforementioned payments to the authorities.

## 4. Human rights, equality and non-discrimination

In its operations, SOL complies with all fundamental human rights, including the right to life, freedom of thought, conscience and religion, freedom of opinion and expression, freedom of movement, the right to work, the right to an adequate standard of living, the

right to rest and leisure, the right to education and the right to a clean, healthy and sustainable environment..

At SOL, all employees are treated equally. Decisions concerning employees are made in such a way that race, ethnic background, nationality, religion or creed, gender, gender identity, sexual orientation, age, disability, marital status or family situation or other similar reasons do not affect the decision-making.

## **5. Environmental responsibility**

SOL complies with legislation on environmental protection in its operations. In its operations, SOL promotes the efficient use of resources, such as energy and materials, and reduces the use and amount of substances that have a negative impact on the climate. SOL pays attention to the treatment of waste generated in its operations and the use of recycled materials and complies with the instructions and regulations concerning the treatment of waste and the use of recycled materials. SOL assesses the environmental impacts of its operations and develops operating methods towards more sustainable practices. SOL promotes circular economy and the use of materials and environmentally friendly technologies. SOL and SOL employees work systematically and proactively to promote environmental responsibility and minimise the harmful impacts of their in-house operations on the environment.

SOL prohibits the cruel treatment of animals in its operations and complies with animal welfare laws and international recommendations when procuring materials derived from animals.

## **6. Data protection and data security**

SOL respects everyone's right to privacy. SOL is committed to processing the personal data of SOL employees, customers and other stakeholders responsibly, securely and in compliance with data protection legislation. SOL exercises due care in all its operations and ensures that confidential, important or sensitive information is not lost or made available to third parties.

## **7. Working environment and working conditions**

### ***Conditions of employment and remuneration***

SOL and SOL employees comply with labour legislation and collective agreements in all terms and conditions of the employment relationship, including working hours. SOL respects its employees' right to fair remuneration. SOL pays its employees a salary in accordance with legislation and collective agreements. SOL strives to ensure equal treatment of SOL employees and aims to support a reasonable standard of living.

### ***Occupational health and safety***

SOL and SOL employees undertake to comply with occupational health and safety legislation. SOL is committed to providing its employees with healthy and safe working conditions that meet the legal requirements. SOL sees to the occupational safety of its employees and prevents accidents and incidents by, for example, arranging sufficient orientation and training for its employees as well as the necessary equipment and protective equipment.

SOL ensures that employees have access to drinking water, adequate ventilation, appropriate working temperatures and lighting, as well as safe and clean dining and rest areas and clean and safe cooking and food storage facilities.

SOL employees must not work at SOL's or the customer's premises/work sites whilst under the influence of alcohol, drugs or other intoxicants.

### ***Prohibition of inappropriate behaviour and harassment***

SOL has zero-tolerance towards harassment and inappropriate behaviour. SOL does not tolerate any form of physical, verbal, sexual or psychological harassment, bullying or insulting.

### ***Freedom of association***

SOL and SOL employees respect the right of employees to form or join trade unions. SOL does not discriminate against anyone based on trade union membership.

### ***Child and forced labour and the rights of young workers***

SOL and SOL employees do not recruit workers whose age does not meet the minimum age for employment in accordance with applicable legislation. SOL complies with the legislation on the employment of young employees. The minimum working age for permanent employment is always at least 15 years. Employees under the age of 18 are not made to carry out night work, hazardous work or any other work that may be harmful to their development.

Working at SOL must be voluntary. SOL ensures that employees have the right to resign freely from SOL's service in accordance with legislation and agreements without any penalty. Employees are not obliged to give money or identity documents to the employer to keep under any circumstances.

### ***Financial penalties***

SOL does not, under any circumstances, accept the financial punishment of its employees, such as unjustified financial fines or salary reductions. All SOL employees

have the right to object to such a procedure and report it immediately to their supervisor, management, shop steward, occupational safety representative or the Whistleblowing channel.

## 8. Conflicts of interest and fair competition

SOL employees are expected to promote SOL's interests and to act responsibly and honestly in everything they do. SOL employees must avoid all actions that might result in a conflict of interests. All decisions must be in line with SOL's interests based on an objective assessment. Personal relationships, personal interests or other similar matters must not influence or appear to influence decision-making against SOL's interests. Conflicts of interest related to procurement, such as ownership or secondary positions in competitors' or suppliers' companies, must be reported to SOL's management.

Family relationships or the involvement of a partner or spouse may give rise to a conflict of interest. Conflicts of interest can also arise in other activities, such as recruitment, invoicing or invoice approval. In such situations, decisions and approval must be made by the supervisor's supervisor.

SOL complies with fair and open competition, competition legislation and its spirit. We operate responsibly and professionally in our business.

SOL ensures that its financial statements, accounts and public reporting accurately and truthfully reflect events and business operations. SOL is committed to complying with applicable trade law. SOL does not accept money laundering. SOL does not conduct business with third parties if trade sanctions prevent it. SOL selects its business partners based on objective business criteria and social, economic and environmental responsibility.

SOL does not grant direct or indirect support to political parties, organisations or individual politicians.

## 9. Communications and publicity

SOL and SOL employees communicate responsibly, transparently and openly with all stakeholders. SOL respects everyone's right to express themselves and their

opinions without insulting anyone.

Every SOL employee is obliged not to disclose or disseminate confidential or sensitive information about SOL, SOL employees, customers or other stakeholders to external parties. Confidentiality and communication rules apply to working hours and time off, such as communication on social media.

At SOL, only separately appointed communications and management representatives have the right to make public statements or stands related to SOL or its operations.

## 10. Misconduct and the whistleblowing channel

SOL does not tolerate any fraudulent activity in its operations. SOL takes breaches of this Code seriously and each case will be investigated. Non-compliance may result in disciplinary action or even civil or criminal liability.

SOL's property or brand may not be used for personal gain or illegal activities. This applies to physical, intangible and electronic assets.

All fraudulent or inappropriate activities, misconduct or conduct that violates legislation, internal policies or this Code must be reported to the supervisor in the first instance. Serious cases must also be reported to the Service Director, Regional Director and, if necessary, the Business Director, Managing Director or Legal Director. If the matter cannot be reported in one's own name, it can be reported through SOL's Whistleblowing channel.

The whistleblowing channel is available to all SOL employees and SOL's stakeholders. With the whistleblowing channel, SOL promotes compliance with SOL's business principles and the trust of customers and other stakeholders in SOL. SOL employees and stakeholders may express concerns or suspicions about something that violates legislation, good business practices, SOL's values or guidelines, and which may have serious consequences for SOL, SOL's customers, partners or an individual. All reports will be processed confidentially, and the whistleblower shall not be retaliated against in any way.

