

# Telko Groups Supplier Code of Conduct

## Purpose of the Code

This Code aims to communicate our commitment to sustainable procurement across our value chain. By adhering to high standards, we foster strong partnerships with our suppliers and build long-term relationships to achieve mutual sustainability goals. Our diverse network of suppliers, service providers, and subcontractors is integral to our success, and we value open communication, adherence to agreements, and mutual trust. Supplier selection is based on objective criteria, ensuring that personal interests do not influence decisions. Suppliers are expected to meet our requirements regarding sustainability, quality, reliability, pricing, delivery capability, and operational practices. Suppliers must comply with all applicable laws and regulations, including but not limited to international product stewardship, human rights, labor rights, and environmental issues. Suppliers must also adhere to relevant market-specific product stewardship requirements, which involve minimizing the negative impact of products throughout their lifecycle, including end-of-life management.

## Our commitments

Our company's mission is to connect industrial customers and principals in a sustainable manner, aiming to be a leader in sustainability. We are committed to improving social and environmental conditions throughout our value chain while upholding human and labor rights to enhance the quality of life. As part of Aspo group, our commitment is published in detail in Aspo Code of conduct. This Supplier Code of Conduct outlines the standards we expect from our suppliers.

We evaluate potential risks and impacts across our value chain and collaborate with our partners within Telko's scope of operations to implement measures to mitigate or eliminate these risks and impacts. We also promote awareness of this policy among our employees, enabling them to integrate sustainability principles into procurement and purchasing decisions on behalf of our company.

## Scope of the Code

This Supplier Code of Conduct details the principles that Telko adheres to in its operating countries. We expect our suppliers to align with these principles in all their interactions with our company, their employees, suppliers, and third parties. Telko requires all suppliers to read these principles carefully and adjust their activities accordingly.

## BUSINESS ETHICS

### Conflicts of interest

Suppliers shall avoid all conflicts of interest and situations that may lead to a conflict of interests in all their activities involving Telko. Suppliers must inform Telko about any actual, potential, or perceived conflicts of interest related to their role as a Telko supplier. This includes disclosing any financial interests that a Telko employee, customer, or their relatives may have in the supplier's business.

### Fair Competition and Antitrust Compliance

Suppliers are required to comply with antitrust and competition laws and must establish effective processes and procedures to prevent anti-competitive behavior, ensuring their business practices align with fair competition principles.

### Data privacy

Suppliers must comply with relevant data privacy legislation and policies, including but not limited to the EU's General Data Protection Regulation (GDPR) and other related regulations.

### **Zero tolerance for corruption and bribery**

All forms of corruption, bribery, money laundering and any unlawful trade practices are strictly prohibited in Telko value chain. Suppliers shall comply with applicable trade sanction programs and refrain from paying or receiving bribes or other illegal payments to initiate or promote business. Suppliers shall commit to prevent any form of bribery, corruption or money laundering. Payments (including facilitation payments), gifts or any other commitments must not be made in order to obtain or retain business, secure an improper advantage or influence someone to improperly perform their duties. We do not offer or accept any hospitality, gifts, or benefits that could reasonably be assumed to influence business decisions or that exceed the limits of ordinary hospitality and gifts.

## **ENVIRONMENTAL RESPONSIBILITY**

### **Sustainability**

Suppliers are expected to actively strive to maximize the positive and minimize the negative impacts of their operations and value chains on the environment and society. This includes establishing environmental plans focused on critical environmental impacts. Suppliers must ensure they obtain, maintain, and follow the reporting guidelines for all required environmental permits and registrations.

Telko supports the Science Based Targets initiative (SBTi), and depending on the product, goods, or service, suppliers may be required to provide relevant greenhouse gas (GHG) data. Suppliers must actively monitor, report, and work to reduce GHG emissions from their operations and value chains, as we consider GHG emissions a key factor in supplier selection.

## **SOCIAL RESPONSIBILITY**

### **Human and labor rights**

Suppliers are expected to support and respect internationally recognized human rights and to treat their employees fairly, equally, and with dignity. Our company does not tolerate any form of discrimination, intimidation, or harassment. Suppliers must not employ workers under the age of 15 or the legal national minimum age, whichever is higher, in accordance with ILO Convention 138 on child labor. Suppliers must have systems and controls to ensure that modern slavery is not taking place. Suppliers must not engage in or benefit from any form of forced labor or debt bondage. Suppliers must observe normal working hours in compliance with applicable laws and collective agreements, and pay employees at least the national minimum wage, recognizing the right to reasonable remuneration.

### **Social dialogue**

Suppliers must ensure that relevant stakeholders have access to grievance channels that allow them to anonymously report concerns about potential misconduct related to the requirements of this Code. Telko has an anonymous whistleblowing channel available to our stakeholders on our web pages to report any suspicions of misconduct that should be prevented or corrected. All reports are handled in due course and on time. Telko does not tolerate retaliation against anyone who in good faith reports possible violations of this Code.

### **Safe work environment**

Suppliers must ensure safe working conditions and a healthy work environment for their employees, complying with at least the minimum standards for working conditions as set by local laws and regulations. Preventing accidents and work-related injuries is essential.

### **APPROVAL OF SUPPLIER CODE OF CONDUCT**

By engaging in business with our company, suppliers agree to comply with this Supplier Code of Conduct and adhere to any related instructions. Our suppliers acknowledge the values and principles stated in this Code. Alternatively, suppliers shall demonstrate their commitment by adopting their own code of conduct or other formal policies that reflect these values and standards.

Suppliers should have sufficient due diligence process in place to identify, assess, eliminate or mitigate the risks of potential adverse effects related to human rights and environment. We actively promote compliance with the principles outlined in this Code and monitor supplier performance accordingly. Suppliers commit to ensuring that their own suppliers, subcontractors, representatives, consortium partners, and other business partners uphold and promote the principles of this Code. Telko reserves the right to request additional information and/or conduct inspections to ensure compliance.

Telko desires to help its partners in value chain to correct perceived shortcomings. Telko may terminate business relationship in case of a material breach of this Code or the Supplier refusing to take corrective actions within an agreed period.

This Supplier Code of Conduct is reviewed regularly, based on agreed intervals, internal feedback, and developments in the broader corporate strategy.

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