

## SUPPLIER CODE OF CONDUCT

In alignment with UTU's values, we aim to improve our operations, products, and services. It is imperative for us to operate in accordance with our values, establish common ground rules, and maintain integrity within our work community, as well as towards our clients and stakeholders. We are actively developing our operations and we are committed to sustainable development. Each person at UTU is bound by UTU's code of conduct. We uphold good ethical principles and wish to pass this on to our stakeholders.

As part of this ongoing development, we want to ensure that our key suppliers, service providers and subcontractors recognize and adhere to our principles. We expect our suppliers to comply with applicable laws and take responsibility for the economic, social, and environmental impacts of their operations.

This code of conduct is applicable to all suppliers, service providers, and their employees. UTU prefers suppliers who commit to international human rights laws and environmental laws, as well as to the guidelines outlined in this code of conduct. UTU strives to address any activities that contravene these ethical guidelines. Moreover, UTU requests that its suppliers refrain from engaging in any procurement activities that may involve human rights violations or other illegal practices.

### 1. Compliance with Laws

Our suppliers are required to adhere to the laws and regulations applicable in the countries where they operate. All products and services provided by suppliers must comply with local regulations.

### 2. Human Rights and Fair Working Conditions

At UTU, we respect the human rights outlined in the UN's Universal Declaration of Human Rights and adhere to the International Labor Organization ILO's declaration on Fundamental Principles and Rights at Work. We are committed to operating in accordance with the UN's guiding principles on business and human rights.

Similarly, we require our suppliers to ensure that they are not involved, directly or indirectly, in any human rights violations, and to actively support the realization of human rights in all their activities. When detecting activities that threaten human rights, suppliers must take immediate action to rectify the situation. We mandate our suppliers to comply with national legislation, collective agreements, and other relevant agreements.

We expect fair compensation practices from our suppliers. The supplier must pay employees at least the minimum wage required by the applicable legislation.

Our suppliers must guarantee that no forced labor or child labor are used in their operations. Furthermore, they are required to adhere to laws prohibiting human trafficking and abide by the minimum age requirements for employees set forth by the ILO.

### 3. Occupational Safety and Health

At UTU, we prioritize the well-being of our employees and foster a culture of health and safety within our organization. We hold our suppliers to the same standard.

Our suppliers are expected to comply with local laws and regulations pertaining to occupational safety and health as a minimum requirement. We require our suppliers to actively monitor workplace safety and implement preventive measures to mitigate accidents and injuries. We encourage our suppliers to actively assess safety and health risks.

Non-discrimination and fair, respectful treatment of employees are fundamental expectations from our suppliers. We require that suppliers ensure a work environment free from harassment and discrimination for all employees.

#### **4. Environmental Considerations**

At UTU, we consider environmental factors across all our operations, striving to advance sustainable development through innovative products and services.

Our suppliers are required to adhere to environmental legislation in all their activities. We expect suppliers to minimize adverse environmental impacts and actively engage in environmental protection efforts. It is essential that our suppliers ensure their operations comply with relevant regulations concerning soil protection, air and water pollution, management of toxic and hazardous substances, packaging, and waste treatment.

We encourage our suppliers to demonstrate their commitment to environmental protection and to measuring and reducing their carbon footprint. Furthermore, we advocate for resource efficiency and waste reduction practices among our suppliers.

#### **5. Anti-corruption**

At UTU, we uphold strong business ethics across all our operations. We do not accept corruption or bribery in any form – any act driven by self-interest or an attempt to exert inappropriate or illegal influence is considered unacceptable. We expect our suppliers to adhere to the same standards, refraining from engaging in corruption and abstaining from giving or receiving gifts that could be perceived as attempts to influence operations. Suppliers must also avoid situations where conflicts of interest may arise. Should such a conflict arise, we require suppliers to disclose the situation and recuse themselves. In addition, we mandate our suppliers to comply with all anti-corruption laws, directives, and regulations.

#### **6. Information Security and Data Protection**

At UTU, we are committed to securing and protecting both our own and our stakeholders' information that we process. We handle personal data and business-related confidential information with utmost care, ensuring appropriate processing only as required by legal or business necessity, and we do not store information that does not have a legal or business basis.

We extend these expectations to our suppliers, requiring them to consistently uphold the confidentiality and legality of data collection, storage, and handling.

#### **7. Ethical Competition**

At UTU, we engage in competition with integrity and fairness, and we hold our suppliers to the same standard. We expect our suppliers to consistently adhere to relevant competition legislation, prohibiting any activities aimed at restraining or distorting competition, whether in intent or effect.

#### **8. Behavioral Principles**

At UTU, we uphold a zero-tolerance policy towards discrimination, harassment, or any form of inappropriate treatment, and we are dedicated to ensuring equal opportunities for all our employees. We expect our suppliers to foster a similar organizational culture.

We believe that encouraging open and honest dialogue is essential for healthy cooperation. Our organizational culture encourages constructive discussions, even on challenging topics, as we recognize that such discussions facilitate learning and growth. Similarly, our suppliers are expected to cultivate an atmosphere conducive to open discussion, welcoming diverse perspectives.

UTU is deeply committed to continually improving our operational practices, both as a collective and on an individual level. We advocate for lifelong learning and expect our suppliers to actively invest in the development of their organization and employees.

We conduct ourselves with respect and fairness towards our colleagues, customers, and stakeholders' representatives, and we expect this from our suppliers also. Transparency and fairness are expectations in all interactions.

### **Notifiable Activity and Monitoring**

Should a supplier discover a breach of these ethical operating principles within its own operations or among its network of subcontractors or suspects a violation in connection with the products or services delivered to UTU, immediate reporting to UTU is mandatory.

All reports, regardless of the method of reporting, will be handled with discretion and confidentiality. Any activity contravening our ethical principles will undergo investigation. UTU Group is committed to protecting the rights and privacy of all individuals who report violations in good faith.