

PRINCIPLES AND GUIDELINES FOR GOOD BUSINESS PRACTICE AT NESTOR CABLES OY

Following laws, honesty, integrity and openness

One of the company's most important tasks is to sustain and constantly develop profitable business activities. Following the currently valid acts and regulations and working honestly and ethically is considered self-evident in the company. These principles guide the company's day-to-day business.

The company provides its stakeholders with information about its status and operations in accordance with the valid laws, openly, and transparently.

Donations to political or religious groups

The company is not involved in supporting political parties, or political or religious groups.

Conflicts of interest

The company's employees and management must avoid any activities that create a conflict between their personal and the company's interest. A conflict of interest may arise when an employee or manager engages in equivalent private business in the same business area as the company, in another job or entrepreneurship, a personal, private business relationship with the company's stakeholders, or some other similar activities. None of the company's employees or managers may pursue their personal interest or the interest of a friend, family member or acquaintance by making use of the company's property or knowledge or status in the company.

We stand firmly against bribery and corruption

The company is explicitly against bribery and corruption. The company's staff or those working on behalf of the company may not accept or offer benefits or privileges with the exception of low-value gifts or reasonable hospitality in connection with regular business activities. The persons may also not engage in any activities that could affect the capability of the company or a person acting on behalf of it to make objective and honest decisions or which would aim at influencing the objective and honest decision-making of a client, public authority or some other stakeholder.

Environment, health and safety

The company's entire personnel is committed to working towards set environmental objectives. An environmental policy has been drawn up for the company.

In an effort to reach the set environmental targets, the company pays attention to environmental factors in all its operations, follows valid legislation, and prepares to any legislative reforms in advance by following changes occurring in society, continuously develops the management, steering and reporting of environmental issues, requires its stakeholders to engage in activities that support the achievement of the company's environmental objectives, and guides its employees to act responsibly in environmental issues through training and communications.

The company is committed to providing each of its employees with a safe and healthy working environment. Each manager and employee is required to comply with all valid laws and instructions related to occupational safety and health.

Conflict minerals

Conflict minerals include tantalum, tin, tungsten and gold sourced from the Democratic Republic of Congo and neighbouring countries. The quarrying and trade in these minerals in the conflict areas may finance armed groups known to violate human rights. As a result, the above four metals are referred to as conflict minerals.

Of the minerals identified above, the company uses small amounts of tin-plated copper wires with minimal tin content. The company has verified that the suppliers of these products purchase their materials from well-sourced subcontractors whose metals considered conflict minerals do not originate from the conflict areas.

Respecting human rights and fundamental labour rights

The company respects and supports the principles laid down in the UN Universal Declaration of Human Rights and ILO Declaration on Fundamental Principles and Rights at Work in its sphere of influence and within the framework of valid legislation in every country where the company operates.

Human rights considered as fundamental and universal by the company include: the freedom of thought, freedom of opinion, freedom of expression, freedom of religion and freedom of peaceful assembly, and freedom from discrimination on the grounds of race, age, nationality, sex or sexual orientation.

The company does not use forced labour or child labour. The company respects its employees' freedom of assembly and right to join different labour unions and other representative bodies.

Compliance with data protection, privacy and whistleblowing

The company is dedicated to upholding the highest standards of data protection, privacy and whistleblowing practices. The company recognizes the importance of safeguarding the personal information of our employees, customers, and other stakeholders, and strictly adheres to the General Data Protection Regulation of the European Union and any other applicable data protection legislation in all aspects of our operations. Transparency and accountability are paramount in the company's approach to handling personal data.

The company maintains firm whistleblowing mechanisms to encourage the reporting of any unethical, illegal, or non-compliant behavior. Employees are encouraged to speak up without fear of retaliation and can report concerns through a designated channel, knowing that their confidentiality will be respected, and that appropriate action will be taken.

Responsibility as an employer

The company places importance on maintaining and promoting equality in the working community. All individuals are respected regardless of their sex, worldview, age and equivalent factors on the basis of treating all individuals fairly. Any discrimination and bullying is forbidden.

Partners

Within the limits of its sphere of influence, the company aims to ensure that its partners and subcontractors follow principles for good business practice equivalent to this document. This serves as the premise for entering into and maintaining business relationships.

Implementation and compliance

Every member of personnel in the company must comply with these guidelines. The personnel are requested to contact their supervisors, management or the person supervising compliance with the guidelines if there is any certainty related to the issues presented in this document.

The person supervising compliance with the instructions:

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A violation of these guidelines may lead to disciplinary measures. All members of personnel are required to inform their supervisor, the company's CEO or the person supervising compliance of any violation of these guidelines. Violations reported in good faith will not lead to adverse work-related consequences. The rights and privacy of the person reporting an incident are protected in processing the matter.