

Code of Conduct

This document expresses the ethical values and practices of Uniogen Oy's business operations. They define how we as a company want to treat people, society, and the environment.

UNIOGEN'S CORPORATE CULTURAL VALUES

Uniogen's corporate cultural and ethical values describe and guide our daily operations as a company. Uniogen Oy's corporate cultural values were defined with the personnel and are updated when necessary. The corporate cultural values are summarized as follows:

Together:

We listen to our customers and cooperate with them. We work together and support each other. Everyone's contribution is needed. We care about each other and society. It is pleasant to work with us.

Intentionally:

We do the right things at the right time. We focus on the essential. There are grounds for our actions. Our work has a purpose. We act responsibly.

Evolving:

Continuous development is at our core. We learn from each other, our customers, and our partners. We share what we have learned. We create innovative solutions for our customers.

Flexibly:

We offer our customers flexible service. We take into account our employees' various life situations. As an organization, we operate smoothly and flexibly.

CONTENTS

Uniogen’s corporate cultural values	1
Contents	2
1 Introduction	3
2 Compliance with laws and regulations	3
3 Responsibilities	3
4 Transparency.....	3
5 Labor and human rights	3
6 Work community	4
7 Occupational health and safety	4
8 Environment.....	4
9 Conflict of interest and corruption	5
10 Competition and antitrust laws	5
11 Innovation and proprietary information.....	5
12 Data security	5
13 Accuracy of reports and accounts.....	5
14 Implementation of the code	6
15 Procedures for reporting infringements	6
16 Consequences of infringements	6
Change history	7

1 INTRODUCTION

Uniogen is committed to responsible business operations. Uniogen recognizes its own social responsibility, and its operations are an integral part of the company's practices. Uniogen is committed to integrity and fairness in all its operations and to acting in accordance with this Code of Conduct and the related guidelines and procedures. Uniogen's responsible operations have a positive impact not only on the company itself, but also on the owners, the value chain, and the surrounding community and nature.

2 COMPLIANCE WITH LAWS AND REGULATIONS

Uniogen's business is carried out sustainably and in compliance with all applicable laws, both in Finland and on international markets. Uniogen is committed to developing its governance toward the Corporate Governance Code published by the Securities Market Association.

3 RESPONSIBILITIES

Every employee is obliged to comply with all laws and regulations that apply to Uniogen's business operations. Each employee must also familiarize themselves with Uniogen's Code of Ethics as part of the orientation. Whenever necessary, the supervisor reviews the Code with their team and ensures that the provisions are understood and followed. Each employee also has a personal responsibility to comply with the provisions of this Code of Conduct and to clarify or seek assistance from their supervisor in the event of doubt.

4 TRANSPARENCY

Uniogen advocates openness and transparency, as well as continuous dialog with its stakeholders. Open discussion and communication with customers, other business partners, shareholders, personnel, authorities, media, and local communities are key to sustainable operations.

5 LABOR AND HUMAN RIGHTS

Uniogen adheres to and supports the labor conventions of the International Labour Organization (ILO) and the United Nations Universal Declaration of Human Rights. Uniogen does not tolerate any form of forced or child labor in its operations and requires business partners and suppliers to prohibit it as well. If there is evidence of such activity, Uniogen may evaluate the renewal of the contract of the business partner or supplier.

6 WORK COMMUNITY

Uniogen's principles include equity, fairness, and transparency. Uniogen's goal is to be a successful company where every employee has equal opportunities to succeed and develop in their work. As part of the work community and in accordance with Uniogen's values, every employee is generally expected to behave well, considerately, and politely toward others. The company's management ensures that equal treatment and transparency are implemented in both daily operations and decision making. Everyone in the work community, or applying for it, is treated respectfully, objectively, equally, and fairly, regardless of age, gender, sexual orientation, religion, skin color, political opinions, health, or ethnic origin, or other similar characteristics.

All unfair treatment at work and discrimination against another person is strictly prohibited. All acts of violence and threats of violence are strictly forbidden and will be addressed immediately. Uniogen does not tolerate any employee behavior that hinders with or distracts another person's work or creates an offensive or threatening work environment.

The Uniogen Personnel Manual and the equality and non-discrimination plan support these themes and contribute to Uniogen's ethical principles.

7 OCCUPATIONAL HEALTH AND SAFETY

Uniogen strives to create risk-free and safe working conditions for its employees and adheres to the principle of preventive occupational healthcare to ensure the health of its employees. Employees have access to comprehensive occupational health services and leisure time accident insurance in addition to statutory insurance. When carrying out work, workers must comply with all safety instructions, wear personal protective equipment as instructed, and report any hazards or possible shortcomings in the safety instructions that they observe. The safety of the products developed by Uniogen is already ensured in the design and testing phases. Uniogen also strives to continuously develop better and safer solutions for its products.

8 ENVIRONMENT

Uniogen strives to reduce the consumption of natural resources, waste, wastage, and climate emissions resulting from its operations, and to optimize production, processes, and procurement to achieve these goals cost-effectively. Every employee must work so that materials and resources such as water, electricity, paper, plastic, packaging materials or chemical substances are not needlessly consumed. Deliberate littering and other forms of pollution of nature and the environment are contrary to environmental legislation. Waste generated in Uniogen's premises must always be either reused or sorted and recycled as accurately as possible to improve the reuse of materials and the energy benefits of waste. Substances that are hazardous to humans and the environment are handled with special care, and the resulting waste is always disposed of in accordance with the instructions. Deliberately harming animals or nature is against Finnish legislation.

9 CONFLICT OF INTEREST AND CORRUPTION

Uniogen expects its employees to be conscientious and loyal to their employer. Uniogen employees should avoid situations where their personal interests could conflict with those of Uniogen. An employee must not receive or offer bribes, gifts, or other substantial or recurring items of value from or to any Uniogen stakeholder, supplier, customer, or other person with whom the company has a business relationship. Occasional offers and receipts of meals, promotional items, or other similar notional and low-value benefits are permitted, as long as they do not affect the individual or organization's relationship with Uniogen or result in special treatment compared to other business partners.

10 COMPETITION AND ANTITRUST LAWS

Competition and antitrust laws protect the free market and allow each company to compete for customers, as well as each customer to choose the best and most affordable product or service. Uniogen employees are not allowed to engage in anti-competitive activities such as price fixing with competitors or dividing customers or market areas. In addition, Uniogen employees must not share strategic information outside the company or request it from competitors.

11 INNOVATION AND PROPRIETARY INFORMATION

Uniogen encourages employees to come up with ideas and create innovations in their work. The intellectual capital of Uniogen and its employees is one of the company's most valuable assets. Each Uniogen employee must protect the company's patents, trademarks, copyrights, trade secrets, intellectual property, and other proprietary information. All Uniogen's physical assets must also be used and maintained with care and be protected from waste and misuse.

12 DATA SECURITY

Uniogen complies with the EU General Data Protection Regulation (GDPR). All information and other assets owned by Uniogen personnel, business partners, customers or other collaborating parties must be handled carefully, confidentially and with respect for privacy. Uniogen employees are not allowed to store, share, or use for their own purposes any personal data or other sensitive information that they have received in the course of their work, accidentally or intentionally, unless they have given their consent or another legal basis in accordance with the EU General Data Protection Regulation.

13 ACCURACY OF REPORTS AND ACCOUNTS

Uniogen operates in accordance with Generally Accepted Accounting Principles. All Uniogen employees, officers and directors are required to record and report honestly and accurately. No Uniogen employee should knowingly make false or misleading statements or withhold any material information for accounting or other reporting related to Uniogen's operations.

14 IMPLEMENTATION OF THE CODE

Uniogen communicates and instructs on the meaning of the Code of Conduct and ensures that it is acted on. Each employee is responsible for their actions, and if they fail to comply with Uniogen's business laws and the policies described in this Code of Conduct, it endangers the operation of the company and thus the employee's workplace.

Suppliers and business partners are an important and integral part of Uniogen's product value chain, which also requires them to operate legally and in compliance with Uniogen's ethical values. Uniogen reviews the implementation of these values in the operations of its suppliers and business partners. The management of Uniogen will review the content of the Code if necessary and consider the need for any changes or additions.

15 PROCEDURES FOR REPORTING INFRINGEMENTS

Every Uniogen employee must report their observations of any activity contrary to the guidance in this document, either to their supervisor or through Uniogen's Whistleblowing channel available on the website. If a Uniogen partner or any other collaborating party observes conduct contrary to this guidance, they should also report it through Uniogen's Whistleblowing channel. Reports submitted through the Whistleblowing channel can be made anonymously if desired. Uniogen will carefully and discreetly review every report submitted. Whistleblowers will not face any discrimination or disciplinary actions if the report is made in good faith, believing that a law or this guidance is being violated.

16 CONSEQUENCES OF INFRINGEMENTS

Any violation of this Code of Conduct may result in liability, notice, warning, probation, suspension or even termination of employment. If the law is violated, the offender may face criminal penalties.



Ilari Antila, CEO

November 29, 2023

Date