

**CODE OF BUSINESS CONDUCT** 

WEST Invest Group is Finnish, in 1959 established family-owned company. WEST Invest Group specialises in providing water treatment, steam and energy solutions for industrial and municipal clients. The following companies belong to our group: Höyrytys Oy, Hyxo Oy, Sakutek Oy, Ubitec Oy, Ekomuovi Oy, KMV-tuotteet Oy, OleiniTec Nordic AB, and the associated company Enico Oy.

In addition to adhering to the requirements outlined in our code of conduct, we also comply with and respect laws, regulations, agreements, and other obligations, as well as good business practices.

It is important to us that our relationships with customers, suppliers, and other business partners are based on mutual trust. We expect our business partners to conduct their business in a manner consistent with these principles. We ensure that they are familiar with our business principles and, where necessary, clarify the expected conduct to a reasonable extent.

WEST Invest Group, February 2024



## 1. Legality

WEST Invest Group and its subsidiaries comply with all applicable laws and other legislation, regulations, and general and specific obligations as well as national and international agreements that affect our operations.

We expect our personnel to be aware of the laws and regulations that apply to their specific role. We keep accurate documents and records of our activities in order to ensure full regulatory and financial accountability.

## 2. Labour conditions and human rights

We adhere to the UN Declaration of Human Rights, which include among other things freedom of opinion and religion, equality and the prohibition of discrimination. We support and promote diversity and equality. Equal treatment and equal opportunities apply to everyone irrespective of gender, gender identity and expression, sexual orientation, ethnical background, religious beliefs, disability or age.

We do not accept any form of psychological or physical punishment, threat of punishment, bullying at the workplace, sexual or other types of harassment, discrimination in connection with employment opportunities or work, forced labour or other types of involuntary work.

We at WEST Invest Group do not tolerate child labour. We comply with the ILO's Declaration on Fundamental Principles and Rights at Work.

At WEST Invest Group, we respect and honour our obligations to employees with regard to national laws and agreements on social security, work conditions and collective bargaining. We respect the freedom of association and the right of collective bargaining of our employees. We pay employees at least the minimum wage and applicable overtime pay as set out in national law or applicable collective agreements. Pay and other benefits must comply with national laws, applicable agreements, and the generally accepted standard.

### 3. Child labour

At WEST Invest Group, we do not tolerate child labour. Under no circumstances do we employ children under the legal minimum age for employment. If no such age is specified, the minimum age is the age at which the child has completed compulsory education. Children over the minimum age cannot be hired for dangerous work or work that may be detrimental to the child's personal development.

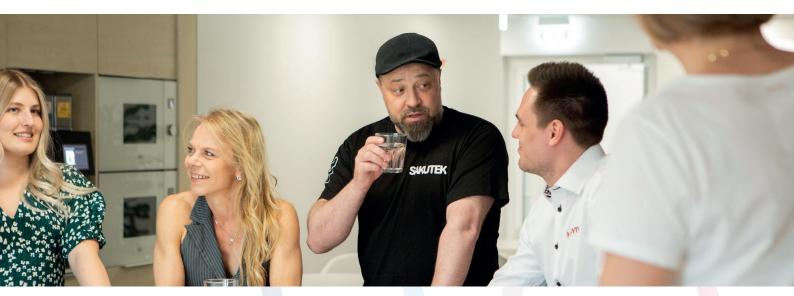
All our employees must be at least 15 years old, whether they are permanent employees, interns, or summer employees. For permanent positions, we hire only individuals who have exceeded the compulsory education age.

## 4. Health and safety in the work environment

We comply with all laws and regulations relating to health and safety. In addition, we apply appropriate procedures and controls in order to have zero work-related accidents or incidents. Workplace safety must always be guaranteed.

It is important to us that we contribute to creating the safest possible work environments for our own personnel as well as for the personnel working for our subcontractors, suppliers, customers, and other stakeholders. We expect all parties to operate safely. We aim to develop methods for improving working conditions and the work environment, and we encourage our personnel to participate in the development work.

We adhere to applicable laws and collective agreements regarding working hours. In the absence of such laws and agreements, we ensure that the regular working hours do not exceed 48 hours per week. We ensure that employees have at least one day off in every seven-day period, unless otherwise required by applicable legislation.



#### 5. Environment

We comply with all laws and regulations relating to protection of the environment. Additionally, we adhere to environmental protection programs, commitments, and regulations applicable to our operations. We strive to minimise the environmental impacts of our activities. We develop internal processes, practices, and guidelines related to this.

In our operations, we strive to ensure safe and environmentally friendly waste disposal. Additionally, we aim to promote efficient resource utilisation, circular economy practices, and phase out fossil fuels.

We seek to collaborate with all our partners to develop sustainable practices and solutions in line with sustainable development goals. In our supplier selection process, we prioritise supplier that consistently work on issues related to occupational safety, social responsibility, environment, and quality.

## 6. Prevention of corruption and bribery

We do not engage in any form of illegal corruption, bribery or extortion. This applies to all our collaborative relationships. Our employees will not, whether on his or her own behalf or on behalf of our companies, accept or offer any direct or indirect benefits that are or may be intended to promote illegal, inappropriate or improper business or personal gain.

All WEST Invest Group employees will avoid situations where their personal interests may conflict with those of our Group or its stakeholders.

We will not under any circumstances become involved in any form of money laundering.

### 7. Fair competition

We comply with all applicable, national and international, laws and regulations relating to fair competition and antitrust. We do not engage in activities that might restrain or distort fair competition.

It is important for us to act fairly, sincerely, and honestly towards all of our competitors.

## 8. Data protection

We recognise that the information received by us from our employees, customers, suppliers and other business partners may be of confidential, privileged or otherwise sensitive nature. We collect and process personal data only in accordance with applicable data protection laws.

We take appropriate steps in order to protect all such information and to prevent any improper disclosure or misuse thereof.

# 9. Compliance and monitoring of the code

We require adherence to our business principles at all levels, from the executive team to supervisors and individual staff members. It is the responsibility of our supervisors to ensure compliance and always set a good example.

Compliance is monitored at all management levels within WEST Invest Group.

In WEST Invest Group, we have implemented a whistleblowing system, which allows reporting of suspected misconduct through an anonymous reporting channel.



Photography: Sini Pennanen, sininenkuva.fi

# **WEST Invest Group**

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## **Our Subsidiaries:**

Höyrytys Oy Hyxo Oy Sakutek Oy Ubitec Oy Ekomuovi Oy KMV-tuotteet Oy OleiniTec Nordic AB Enico Oy www.hoyrytys.fi www.hyxo.fi www.sakutek.fi www.ubitec.fi www.ekomuovi.fi www.kmv.fi www.oleinitec.se www.enico.fi