



**KUMERA**

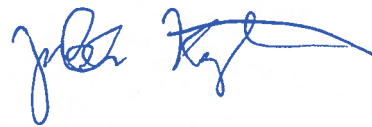
**Code of Conduct**

**Kumera Corporation**

# Code of Conduct

We at Kumera Corporation and its subsidiaries are committed to full compliance with applicable national and international laws and regulations.

The values and principles of integrity, reliability, respect, and sustainability apply to everyone who works for or represents Kumera Corporation or its subsidiaries, later referred to as Kumera.



Jukka Kyttälä  
CEO  
Kumera Corporation

# Code of Conduct

## Integrity and reliability

Kumera's personnel and Board members are expected to act in the company's best interests. Everyone who works for or represents Kumera shall avoid any situation that involves an actual or apparent conflict between his/her personal interest and a good business practice, i.e not offer nor accept any gifts or favors that may be seen as an attempt to influence business decisions.

Any information received through business dealings with customers, suppliers, and/or a third party must be kept confidential and never used for personal advantage. This includes both commercial and technical information. Appropriate non-disclosure or confidentiality agreements (NDA) are and will continue to be used to formalize the process of protecting proprietary information.

Everyone at Kumera shall conduct their business according to a high ethical standard and comply with relevant legislation on bribery, corruption, and prohibited business practice.



# Code of Conduct

## Respect

We at Kumera respect the different cultures, their behaviors, and their way of living.

Mutual trust is built through the integrity and reliability of words and actions. Therefore commitments provided to our customers, business partners, authorities, suppliers, and our employees shall be truthful and correct.

We respect the rules governing free and fair competition and are committed to comply with applicable antitrust and other laws regulating competition.

## Sustainability

Kumera will provide appropriate health, safety and welfare for the employees, visitors and contractors and those in the community who may be affected by Kumera's activities.

A safe and hygienic working environment will be provided and an occupational health and safety practice promoted, bearing in mind the prevailing knowledge of the industry and any specific hazards in it.

Health, safety and environmental risks shall be assessed and appropriate actions and controls put in place.

Kumera is committed to operate in accordance with the principles of sustainable development using responsible natural resources, continuously improving its environmental performance, as well as preventing pollution.

# Code of Conduct

## Employee involvement

Kumera will maintain and further develop constructive relationships with employees and employee representatives and to recognize the rights of individuals to join or not to join labor unions. Kumera will observe the legislation in each country of operation regarding collective representation.

## Diversity and equality

Kumera will provide equality of opportunity and treatment regardless of race, color, gender, religion, nationality, sexual orientation, age, or disability.

Kumera will support equal pay for work of equal value and oppose discrimination or intimidation towards employees including all forms or threats of physical and psychological abuse.

## Pay and benefits

As a minimum, Kumera will comply with all national regulations on pay and benefits. These should be sufficient to meet basic needs of workers and their families.

# **Code of Conduct**

## **Working hours**

Kumera will comply with national regulations on working hours. Employees should have annual leave provision and be permitted at least one non-working day per seven days on average.

## **Forced or involuntary labor**

Kumera believes that employment should be freely chosen and therefore expects that suppliers refrain from using any form of forced, involuntary, or debt-bonded labor.

## **Child labor**

Kumera will oppose to the use of any form of child labor or practices that inhibit the development of children. Suppliers must comply with all child labor laws and should not employ anyone under the age of 15, or where it is higher, the mandatory school leaving age in the local country.

## **Communications**

The local management is responsible to communicate the Kumera Code of Conduct to their employees.

# Code of Conduct

## Monitoring / Recordkeeping

Suppliers shall ensure that documentation is maintained to demonstrate compliance with the Kumera Code of Conduct and shall provide access to that documentation upon request of Kumera.

## Supplier selection

Kumera will expect suppliers to comply with the principles in this Code of Conduct. Suppliers should disseminate these values throughout their own supply chain and then incorporate them as part of routine improvement activities.

Suppliers are an integral part of our total supply chain. We choose our suppliers with care and on the basis of objective factors such as quality, reliability, delivery, and price, without preference for personal reasons. Suppliers are expected to conduct their business in compliance with international human rights and environmental laws and practices. Further, in their actions and operations suppliers and sub-contractors are expected to follow national laws of the countries they operate in.