

## ETHICAL GUIDELINES FOR PARTNERS

### 1 GENERAL INFORMATION

Consti Oyj and its subsidiaries (hereinafter "Consti" ) are responsibly operating construction companies. Consti strives for high ethical standards in all of its operations, and expects its contracting parties to operate according to the same principles.

These ethical guidelines concern all of Consti's contracting parties, partners, subcontractors, sub-suppliers and representatives (hereinafter "the Partner"). These ethical guidelines complement existing laws and regulations and they are a part of the terms applicable to the agreement between Consti and the Partner.

#### 1.1 Adherence to law

Consti adheres to legislation, official decrees and ethical business principles in all of its operations. Consti requires that the Partner adheres to all legislation and official decrees applicable to its operations, as well as to these ethical guidelines.

#### 1.2 Commitment to ethical guidelines

The Partner and its possible group companies, subcontractors and sub-suppliers must commit to following these ethical guidelines in all of their operations. The Partner is obligated to actively ensure and supervise that the subcontractors of its subcontractors fulfil all requirements to ensure that the ethical guidelines are adhered to throughout the supply chain.

#### 1.3 Supervision of adherence

Consti supervises adherence to these ethical guidelines. The Partner is obligated to provide information regarding adherence to these guidelines on Consti's request. Consti has the right to conduct needed inspections at the locations and offices of the Partner and its group companies to ensure that the guidelines are being followed.

If the Partner breaches or neglects its obligations regarding these ethical guidelines, it must immediately correct its behaviour or intervene in the behaviour of its group company, subcontractor, sub-supplier or partner, and notify Consti of the breaches as well as the related corrective measures it has taken without delay.

If corrective measures are not taken in the agreed upon or otherwise reasonable period of time, and the breaches or acts of negligence in question are significant, Consti

has the right

to ultimately terminate the agreement with the Partner according to the termination procedures defined in the agreement.

### 2 ETHICAL OPERATIONS

#### 2.1 Prevention of bribery and corruption

Consti does not approve of corruption or bribery in any way, shape or form. The Partner commits to not engaging in bribery or other criminal or unethical acts in its business operations with Consti or any other party.

The Partner commits to not engaging in money laundering or equivalent criminal activities. The Partner's organisation must have instructions in writing on the prevention of bribery and corruption.

#### 2.2 Conflicts of interest

If the Partner knows or suspects a possible conflict of interest exists that could affect Consti's business decisions, the Partner must notify Consti of the matter immediately.

An example of a conflict of interest would be a situation where the personal interests of Consti's or the Partner's employees or the interests of the social or other stakeholder groups of the employees could potentially affect the partnership or agreements made with the Partner.

#### 2.3 Promotion of competition

Consti adheres to fair and open competition. Actions that go against the letter or spirit of competition legislation are prohibited. Such prohibited actions include illegal price fixing, market sharing and unethical trading.

The Partner commits to competing according to these principles as well as adhering to competition legislation in effect at the time.

### 3 HUMAN RIGHTS AND THE EQUAL TREATMENT OF EMPLOYEES

#### 3.1 The right to organize and a ban on discrimination

The Partner is obligated to respect the legal rights of its employees, including their right to organize and participate in collective bargaining.

The Partner must treat its personnel equally, regardless of their sex, age or origin. The Partner commits to adhering to the basic values of human rights, such as equality and non-discrimination,

and the employer does not discriminate against employees on the basis of such factors as sexual orientation, nationality, race, sex, age or religion. The Partner must have zero tolerance for any kind of harassment, bullying, threats or other inappropriate behaviour towards employees.

### 3.2 Child and forced labour and the rights of young employees

The Partner may not use child labour in any form and it may not breach any laws or decrees on the use of child labour, or the guidelines and norms issued about the matter by the United Nations. The Partner does not hire or otherwise indirectly employ persons who are younger than the minimum working age defined in legislation.

The minimum working age is always at least 15 years. Persons under 18 years of age may not work at nights, do dangerous work tasks or conduct any other work that might be detrimental to their development.

The Partner commits to prohibiting all kinds of forced labour and ensuring that its employees have the right to terminate their employment within a justifiable period of notice and in accordance with applicable laws and collective labour agreements. Furthermore, the Partner does not have the right to demand that its employees hand over money or personal documents to be stored by the employer.

### 3.3 Salary and working hours

The Partner commits to adhering to applicable working time legislation and paying its employees a reasonable and just salary, which is always at least the minimum salary according to applicable laws or collective labour agreements and regulations concerning overtime work and statutory benefits.

The Partner commits to ensuring that its employees and the employees of its subcontractors understand the terms and conditions of their employment contract.

### 3.4 Health, security and industrial safety

The Partner commits to adhering to laws and regulations on industrial safety and offers its employees safe and healthy working conditions that always fulfil the requirements of legislation in effect at the time. The Partner must promote occupational safety and prevent accidents and disasters by such means as providing its employees with adequate training, tools and equipment.

The Partner's employees are not allowed to work on Consti construction sites under the influence of alcohol, drugs or any other intoxicants. When needed, Consti has the right to supervise the sobriety of employees with random tests within the boundaries of legislation.

## 4 ENVIRONMENT

The Partner commits to ensuring that its operations are not in violation of laws, decrees or generally accepted EU norms regarding environmental protection. The Partner must work systematically and proactively to fulfil its environmental responsibilities and to minimise the harmful environmental impacts of its operations.

The Partner commits to promoting the efficient use of resources, such as energy and materials, in its operations and to reducing the use and number of substances with detrimental climate impacts.

The Partner must pay attention to the treatment of waste created by its operations and to using recycled materials in its products. The Partner is obligated to adhere to the instructions, rules and regulations on the treatment of waste and the use of recycled materials.

The Partner must survey the environmental stresses caused by its operations and develop its methods in a more sustainable direction.

## 5 COMING INTO FORCE

These ethical guidelines for partners have been approved by Consti's management group on 14.06.2021.