CODE OF CONDUCT

1 INTRODUCTION

In addition to the laws, regulations, processes and guidelines, all employees at DA-Group are expected to act ethically. For this reason, DA-Group has established their Code of Conduct. This Code of Conduct governs our conduct both internally and in interactions with external parties such as customers, partners, suppliers, communities and society at large.

By adhering to the Code of Conduct, our operations in various situations comply not only with the applicable laws and regulations, but also with the principles of good business practice, honesty and integrity. This Code of Conduct applies to all employees, staff members, senior personnel and management at DA-Group.

DA-Group also expects its suppliers and subcontractors (hereinafter referred to as “partners”) to operate in accordance with this Code of Conduct and may carry out audits to verify compliance. DA-Group reserves the right to immediately terminate cooperation with any supplier who acts in violation of the laws, regulations or the Code of Conduct.

DA-Group’s Code of Conduct is based on five core values, which we believe encompass all areas of our operations:

- Integrity and transparency
- Respect
- Fairness
- Reliability
- Professional excellence

2 COMPLIANCE WITH THE LAWS AND REGULATIONS

DA-Group employees and business partners must conduct their business operations in full compliance with the applicable laws and regulations. This obligation applies to both domestic and international trade, including adherence to any relevant legal requirements and trade restrictions. All business records and administrative processes must follow the applicable laws and regulations governing financial reporting and data management.

Business practices must also comply with the competition legislation and respect intellectual property rights. Participation in any form of bribery or offering of improper inducements is strictly prohibited. Business partners must not offer anything of value that could be perceived as influencing an employee’s decisions in order to retain or enhance the partner’s business relationship with DA-Group.

Business partners are not permitted to speak to the media on behalf of DA-Group unless they have received explicit written authorization to do so from DA-Group.

Conflicts of interest must be avoided. This includes situations in which a spouse, family member or other close associate holds a position of influence in a transaction or business decision. In addition, insider trading must be avoided by refraining from buying or selling based on non-public information.

2.1 Employment related regulations at DA-Group

DA-Group has implemented personnel, training, equality and non-discrimination plans which guide and regulate operations. In addition, an early support model and a substance abuse prevention program are in place and must be followed by all employees.

DA-Group values multiculturalism e.g. by employing individuals who speak only English; communication with them is conducted in English. No unlawful discrimination is present in any DA-Group processes.

The following principles apply to employment relationships at DA-Group:

- DA-Group does not engage in forced labor or child labor. Employees are not coerced into working overtime.
- DA-Group only supports lawful internship programs aimed at training young individuals.
- DA-Group employees must refrain from any form of physical or psychological discipline or harassment.
- DA-Group provides employees with clear written information regarding the terms and conditions of their compensation prior to the start of employment, and as needed, throughout the entire employment relationship. Compensation and benefits for a standard work week must meet or exceed local and national legal requirements.
- DA-Group complies with the laws and regulations concerning maximum working hours, rest periods and overtime compensation.
- DA-Group maintains employee records in accordance with the applicable laws and informs employees of the basis for their compensation through pay slips or equivalent documents.
- DA-Group respects employees' legal rights to organize and engage in collective bargaining.

2.2 Employment related requirements for DA-Group's partners

DA-Group also expects their business partners to operate in a lawful manner and to adhere to good business practices. With regard to employment, partners must:

- Comply with the applicable laws and regulations while treating individuals with respect.
- Prevent the use of forced or child labor and avoid coercing employees into working overtime.
- Support only lawful internship programs for the education of youth, where applicable.
- Refrain from any physical or psychological discipline or harassment.
- Provide employees with clear written information regarding compensation terms before the start of employment and as needed during the course of employment, ensuring that pay and benefits for a standard workweek meet at least the legal minimums.
- Adhere to the laws and regulations regarding maximum working hours, rest periods, and overtime compensation.
- Maintain only lawful employee records and provide employees with transparent pay documentation.
- Respect employees' legal rights to organize and engage in collective bargaining.

2.3 Health and safety

DA-Group and their partners provide a safe and healthy work environment. All health and safety-related laws, regulations and practices are followed. Occupational health services conduct regular workplace visits across all DA-Group locations.

DA-Group has established procedures for reporting and managing workplace accidents and absences due to illness. The early support model is used to promote well-being at work and address emerging issues proactively.

DA-Group's occupational safety committee operates in accordance with legal requirements and convenes regularly. Risk assessments are conducted systematically and necessary corrective actions are planned and implemented. An internal observation process is in place to support continuous improvement. DA-Group also runs a dedicated employee well-being program focused on health and well-being at work.

2.4 Environmental regulations and protection

DA-Group recognizes its societal responsibility concerning environmental protection and complies with the applicable environmental laws and regulations. This includes proper collection and storage of hazardous materials and waste, as well as efforts to minimize all types of waste. Appropriate waste sorting procedures are in place.

Environmental aspects are considered in the design, construction and maintainability of the Kassimäki facility. DA-Group obtains all required environmental permits and ensures compliance. Furthermore, the DA-Group holds an ISO 14001 environmental management certification. DA-Group expects the same level of environmental responsibility from its suppliers and subcontractors.

2.5 Confidentiality, non-compete, intellectual property and security clearances

Technological expertise is the key asset at DA-Group. As such, DA-Group has established specific policies regarding confidentiality, non-compete clauses, intellectual property rights and security.

Security clearances are conducted for all individuals entering DA-Group premises and identities are verified at the gate. Employment contracts include clauses on confidentiality, non-compete obligations, intellectual property, email usage and administration. Confidentiality obligations apply also to non-employees, such as interns, who are required to sign a non-disclosure agreement (NDA).

All new personnel undergo a general introduction that covers employment policies and information security. NDAs are signed with partners as needed.

2.6 Questionable conduct

Any questionable behavior or actions must be reported to the immediate supervisor who will forward the matter to the Chief Security Officer. All reports will be handled appropriately and with due care.