ELERTY OY CODE OF CONDUCT

This Code of Conduct is founded on our core values of expertise, accountability, and being a forerunner. These values guide our decisions, shape our culture, and define how we conduct business every day. It serves as a framework for ethical decision-making and responsible business practices across all our activities.

We are committed to continuous improvement and strive to do things better every day by applying the latest knowledge, best practices, and innovative solutions. We believe that responsible business conduct, professional excellence, and a willingness to challenge conventional approaches are essential to creating long-term value for our clients, partners, employees, and society.

As our business, industry, and regulatory environment continue to evolve, Elerty Oy reserves the right to review, amend, and update this Code of Conduct as necessary.

I. Integrity and Ethical Business

We act with honesty, fairness, and accountability in every interaction. We comply with all applicable laws, regulations, and industry standards in the countries where we operate. We actively avoid conflicts of interest and promptly disclose any actual, potential, or perceived conflicts that may arise.

We do not tolerate bribery, corruption, fraud, or any other unethical business practices. We respect intellectual property rights and honor all confidentiality obligations and agreements. We are committed to conducting business in a manner that promotes trust, transparency, and long-term value for our stakeholders.

II. Respect for People and Human Rights

Our people are our greatest asset, and we are committed to fostering a safe, inclusive, and respectful workplace. We value diversity and promote equality of opportunity for all employees and stakeholders. We provide and maintain a healthy and respectful working environment that supports wellbeing, collaboration, professional development, and continuous learning. Harassment, discrimination, bullying, intimidation, or retaliation of any kind are not tolerated.

We are committed to respecting internationally recognized human rights and conducting business in a manner that promotes dignity, fairness, and respect for all individuals. We do not tolerate forced labor, bonded labor, child labor, human trafficking, or modern

slavery within our operations or supply chains. We expect our employees, contractors, suppliers, and business partners to uphold these principles and comply with applicable laws and regulations.

III. Health, Safety, Security, and Environment (HSSE)

The health, safety, security, and wellbeing of our employees, contractors, clients, and communities are fundamental to our business. We are committed to maintaining a strong safety culture and conducting our operations in a manner that protects people, assets, information, and the environment. We comply with applicable health, safety, security, and environmental laws, regulations, and standards.

We encourage proactive risk management, hazard identification, incident reporting, and continuous improvement in HSSE performance. Every individual has a responsibility to work safely and to stop work when conditions present an unacceptable risk to health, safety, security, or the environment.

IV. Information Security, Cybersecurity, and Responsible Technology

Protecting information and systems is essential to our operations and to maintaining the trust of our clients and stakeholders. We safeguard confidential, personal, proprietary, and client information through appropriate controls and responsible practices. We follow recognized best practices in cybersecurity, information security, and data protection. We use technology responsibly and ensure that access to systems, applications, and information is secure, authorized, and appropriate for business needs.

As technology continues to evolve, we embrace innovation responsibly and ethically. Artificial intelligence and automated tools are deployed transparently and with appropriate human oversight. We strive to ensure fairness, accuracy, reliability, and accountability in AI-supported processes and decision-making. We continuously assess, monitor, and mitigate potential risks associated with the use of emerging technologies to ensure their safe and responsible application.

V. Environmental Responsibility and Sustainability

We recognize our responsibility to minimize our environmental impact and support sustainable development. We use natural resources, energy, and materials efficiently and seek to minimize waste wherever possible. We encourage sustainable practices across our operations, including business travel, procurement activities, and energy consumption.

Through our services, we support clients in operating safely, efficiently, responsibly, and sustainably. We strive to consider environmental impacts in our decision-making and support initiatives that contribute to a lower-carbon and more sustainable future.

VI. Governance, Compliance, and Accountability

Strong governance is fundamental to building trust, maintaining integrity, and achieving long-term success. We maintain transparent, accountable, and responsible business practices in all areas of our operations. We comply with applicable trade laws, export controls, sanctions, customs requirements, and other regulatory obligations relevant to our business activities. We perform appropriate due diligence on clients, suppliers, partners, and other third parties to support compliance with legal and ethical standards.

We regularly review, evaluate, and update our policies, procedures, and controls to meet evolving regulatory requirements, industry standards, and societal expectations. Employees are expected to seek guidance whenever they are uncertain about legal, ethical, or compliance-related obligations.

VII. Speaking Up

We encourage everyone to raise concerns, seek guidance, or report suspected violations of this Code of Conduct. Concerns may be reported through available channels and will be handled respectfully, fairly, and appropriately. Reports may be made confidentially, to the extent permitted by law. Retaliation against any individual who raises concerns or reports potential misconduct in good faith is strictly prohibited and will not be tolerated.

Commitment

By working with or for Elerty Oy, you are expected to understand, uphold, and comply with this Code of Conduct. Together, we ensure that our actions, decisions, and operations consistently reflect our values of integrity, responsibility, respect, sustainability, and excellence.