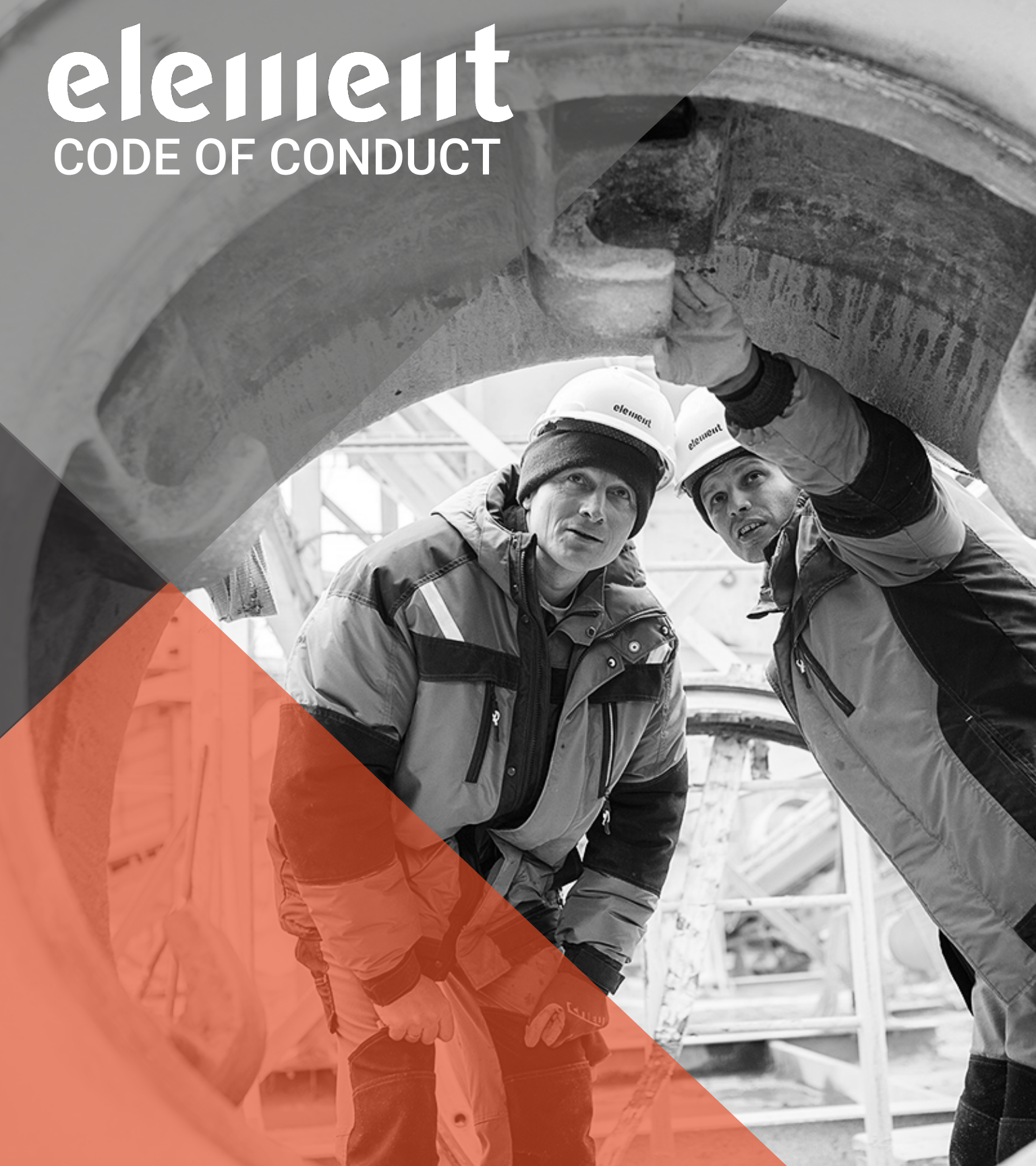


# element

CODE OF CONDUCT



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# ELEMENT GROUP'S CODE OF CONDUCT

Dear Element Colleague and Partner,

Element Group is a versatile, service-based company and produces spare and wear parts for crushing, screening and pumping equipment, in addition to conveyor components, wear-resistant materials and mill linings. Element Group provides a full range of technical and service support. Element Group's values form the foundation for our actions and the values strongly support our Code of Conduct.

## OUR VALUES



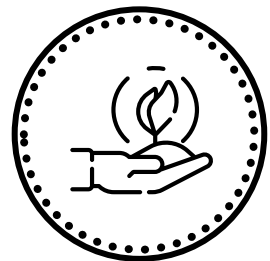
Reliability



Availability



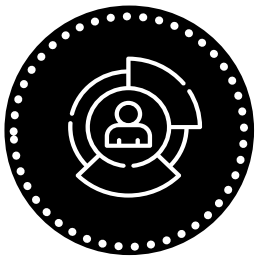
Cooperation



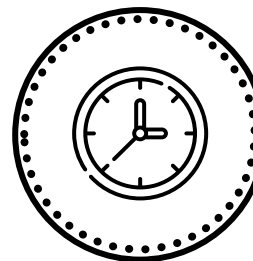
Responsibility



Stability



Competence



Efficiency



Leadership

Element Group's course of action is determined by recording these business principles, i.e. **Element Group's Code of Conduct**. These principles are the same for every employee of Element Group regardless of employment status. All employees, without exception, should be familiar with the Code of Conduct and adhere to the principles and procedures outlined in it.

We also expect our business partners to operate in accordance with these principles.

The Company complies with legislation and follows generally accepted standards of business ethics. The Company does not accept any ways of doing business that would contradict these rules.

The Code of Conduct should be viewed as a document containing the minimum set of standards and requirements accepted by the Company with the aim of promoting fair and ethical business conduct, preventing abuse and for comfortable daily work with colleagues.







## HUMAN RIGHTS

We respect and comply with internationally recognized human rights. Human rights are applied to **all employees, suppliers, agents, consultants and other business partners**. Element Group does not use child labor. All forms of harassment and ill-treatment are prohibited.

We support our employees' right to join labor unions and collective bargaining and encourage open and active dialogue with our employees.

We do not tolerate any conduct by any employee, customer, partner or any person associated with our business activities that harasses, threatens, disrupts or interferes with another person's work performance or creates an intimidating, offensive, abusive, or hostile work environment.

## EQUALITY

We select and appoint employees based on their personal qualifications and skills for the job. We adhere to the principle of pay and employment equality regardless of gender, age, ethnic or national origin, religion, political opinion or social status.

**We appreciate diversity in our employees' background, talent, insight, education and experience,** and believe this contributes to our success and sustainability by enhancing innovativeness, flexibility and the ability to communicate with our stakeholders.





# BUSINESS RELATIONS AND FAIR COMPETITION



# BUSINESS RELATIONS AND FAIR COMPETITION

We want to be an honest and reliable partner, which cooperates only with reliable suppliers and partners. We will make all essential agreements in written form.

We compete honestly in accordance with existing competition laws in all its market areas. We do not restrict competition by agreeing with competitors on prices, allocate customers or market areas. The information about the competitors is gathered only from publicly available sources in accordance with the law.





# WORKING CONDITIONS



# WORKING CONDITIONS

We strive to provide **safe and comfortable working conditions** for its employees.

Safety is based on a risk assessment, risk management and reliable communication. Safety includes looking after our own operations and ensuring that our partners comply with the law and meet our and our customers' health and safety requirements. We also adhere to international labor, quality and human rights agreements.

Our goal is to have a good working environment and **respect for the individual**. We monitor changes in legislation and we always act in the applicable laws, collective agreements and collectively agreed working regulations accordingly. Everyone in the company is also responsible for his own health and occupational safety.





# CONFLICT OF INTEREST

Conflict of interest arises when an employee has any personal relationships, financial or other interests that could prevent him from acting in the interests of the company, without prejudice and effectively performing his work, and also lead to additional financial losses for the Company. **All employees should avoid actions or relationships that conflict or may conflict with the interests of the Company.**

We expect that each employee performs their duties in good faith and does not allow the receipt of personal benefits from the position held. The company, its employees and representatives shall not receive, solicit or give any kind of bribe and we have no tolerance towards any forms of corruption. It is permissible to give and accept symbolic gifts in the Company, typical for normal business practices and that would comply with the requirements of local legislation. It is unacceptable to use gifts (as well as other types of hospitality) to any person in



order to obtain commercial benefits and promote business.

Gifts and entertainment should not affect the ability of an employee to make unbiased and fair business decisions in any way. Gifts in monetary form, as well as their equivalent (gift cards, vouchers, certificates) are prohibited. Small gifts may be received, when the gift does not exceed normal standards of hospitality and if the acceptance of the gift does not affect the decision-making process. It is also allowed to participate in the event organized by the partner, if participation does not affect the decision-making process.





## RESPONSIBILITY FOR THE ENVIRONMENT

We strive to actively recognize our customers' needs and increase production efficiency and safety, widening the raw material base, enhancing the quality and sustainability of end-products, and developing totally new innovations.

We actively **seek to reduce the environmental impact of our operations.** We



obey laws, regulations and administrative provisions regarding the protection of the environment. We inform our customers and other stakeholders about the environmental issues and develop our environmental management system by doing internal and external evaluations. We also **expect our partner's commitment to our environmental requirements.**



## DATA SECURITY

We are aware of privacy regulations and collect and process personal data only for relevant business purposes. We make sure that **the information in our possession is protected and its integrity is guaranteed**. We process information carefully as required by legislation and take care of the protection of privacy when processing personal data.