

ELLEGO™ OPERATIONAL POLICY 8.3.18

We take pride in designing and manufacturing equipment and systems that meet the high level of ethical conduct and compliance requirements set by our Customers, legislation, international conventions and standards, and products that are safe and convenient to use. Our goal is to be the most esteemed and sought-after supplier in our market area.

ELLEGO is strongly committed to acting with integrity according to our four commitments (True caring, Growth and Progress, From maker to maker and Passion for work) that represent the key factors for running a responsible and sustainable business.

We are committed to continuously improve our environmental (E), social (S) and governance (G) conducts to prevent environmental pollution, and to improve occupational safety, quality, and competitiveness.

The following key principles drive our overall conduct:

1. The company management is in charge of developing the organization and competence of personnel in order to achieve the objectives.
2. Each company employee is obligated to do their best to ensure that customer requirements are understood and that they can be fulfilled.
3. Each company employee carries their own share of responsibility for the fulfilment of environmental objectives and obligations, as well as the quality of their own work, occupational safety and following our common procedures. The employees are encouraged to further develop procedures and their own competence.
4. While selecting our cooperation partners, we ensure that their mode of operation, products and services are compatible with our company's quality, environmental, sustainability, and occupational safety requirements.
5. In all our operations, we strive to minimize environmental load. We develop our products and operations by considering the environmental aspects.

Through proficient cooperation and continuous improvement, we aim for flawless deliveries, effective and sustainable operations, safe working environment and Customer satisfaction. We believe this Policy can deliver profitable sustainable and long-term company operations.

LABOUR AND HUMAN RIGHTS

COLLECTIVE BARGAINING AND FREEDOM TO ORGANIZE

ELLEGO respects its employees' rights to bargain collectively and associate in compliance with all applicable regulations and laws. ELLEGO ensures that its employees can always communicate and share ideas and concerns openly with the management without any fear of retaliation or discrimination. If case the local laws restrict the right to collective bargaining or freedom to associate, ELLEGO allows other forms of employee representation and association.

SALARY AND WORKING HOURS

ELLEGO ensures that the working hours and compensation paid to its employees comply with all applicable regulations and **laws, and salary calculations are provided to the employees in language they understand.**

DISCRIMINATION

ELLEGO is committed to offer equal opportunities in employment and education and creates an environment that does not discriminate related to race, age, impairment, religious or political beliefs, marital status or pregnancy, gender identity, family responsibility or family status, sexual orientation, or other similar characteristics not relating to the employee's job or their job qualifications.

DIGNITY AND RESPECT

ELLEGO is treating its employees with dignity and respect and ensure that all its employees benefit from a harassment free working environment. No employee shall be exposed to mental, physical, verbal, or sexual harassment or abuse.

FORCED OR CHILD LABOUR

Under any circumstances, ELLEGO shall not use child labour or engage subcontractors or suppliers that do so. ELLEGO does not allow any form of wage slavery, forced labour, involuntary labour or other measures that are threatening, abusive, exploitative, or physically coercive.

SUSTAINABILITY AND ENVIRONMENT

Sustainability and sustainable development play a vital role in everything ELLEGO does, and it's deeply ingrained in our company culture. Throughout the years, we've taken significant steps to enhance how we manage CO₂ emissions and lessen our environmental impact. Using renewable energy has been a cornerstone of our sustainable development strategy. The energy sources like Sun, wind, and Earth are providing most of the energy our facilities and operations need. Our commitment to sustainability is also evident in our innovative products that help our Customers operate sustainably.

ELLEGO ensures that its processes promote occupational health and safety, resource efficiency, environmental protection, responsible purchasing of raw materials and responsible processing of material waste. ELLEGO aims to obtain, maintain, and comply with all relevant environmental licenses, permits, and registrations for its operations. ELLEGO monitors, tracks, and documents its environmental performance and minimizes environmental impact from its products, services, and operations. ELLEGO aims to reduce its carbon emissions by increasing use of renewable energies, improving efficient use and circulation of raw and packaging materials, minimizing waste, reducing energy and water consumption, and by any other applicable means.

ELLEGO shall manage potential environmental violations and complaints professionally and informs the affected stakeholders. ELLEGO aims to eliminate the use of hazardous substances and to substitute them by less dangerous materials. As applicable, those materials must be reported throughout the entire supply chain, and managed, declared, recycled, and transported in the proper way.

RESPONSIBLE SOURCING OF RAW MATERIALS

ELLEGO evaluates the sources of the raw materials used in its products and follows the OECD Due Diligence guidelines with respect to sourcing, extraction and handling of tantalum, tin, tungsten, gold, and cobalt. The material suppliers shall reliably determine the origin and source of such minerals to ensure that using such minerals does not finance or benefit any armed groups, breach human rights, or negatively impact the environment.

HEALTH AND SAFETY

Health and safety are essential for ELLEGO operations, employees, and for its workplaces. ELLEGO provides a work environment that prevents work-related accidents and occupational illnesses according to all applicable regulations and laws. Appropriate emergency procedures shall be identified and properly implemented, including health and safety information, equipment, and training. Working environment shall contribute to the quality of the products or services of the companies and the consistency of its production and employee retention.

BUSINESS CONDUCT

COMPLIANCE WITH LAWS AND REGULATIONS

ELLEGO complies with applicable laws and regulations, international trade sanctions, customs regulation, export control laws, and treaties on intellectual property rights.

FAIR COMPETITION

ELLEGO supports fair long-term reliable relations with its business partners and supports and strives for free markets and fair competition and refuses to enter into agreements or discussions with competitors concerning pricing, market shares, or other similar activities.

CONFLICTS OF INTEREST AND ANTI-CORRUPTION

ELLEGO has a zero-tolerance policy regarding all kinds of corruption, such as embezzlement and bribery. ELLEGO commits to conduct its business in ethical manner by maintaining a culture of integrity, compliance, transparency, and openness. Bribery is defined as providing, offering, or accepting something of value or benefit with an intention of improperly gaining advantage e. g. influencing a decision or action. Bribes may have form of entertainment, hospitality, gifts or any other kind of advantage or benefit. Customary and reasonable business courtesies are permitted when given in compliance with applicable laws.

DATA PRIVACY, INFORMATION SECURITY AND CYBER SECURITY

ELLEGO understands that it is necessary to exchange and allow the use of contact data of relevant persons in relation to carrying out the purpose of the business relationship. ELLEGO processes and treats such data in accordance with applicable laws and follows mandatory personal data processing principles in safe and secure manner preventing unauthorized access, disclosure, or use. ELLEGO protects and carefully manages confidential information and material in its possession.

ELLEGO is enhancing its processes, data handling, engineering practises and ITC systems against cyber security threats for mitigating risks related to ELLEGO, our Customers and its stakeholders.

SUPPLIERS

The Suppliers have a vital role in the ELLEGO value chain. ELLEGO requires the similar conduct and compliance from its suppliers when dealing with ELLEGO and its employees. This principle forms an integral part of any agreement between ELLEGO, and the supplier and it applies to ELLEGO and all ELLEGO suppliers as well as their employees, group companies, agents, and subcontractors. The Supplier shall proactively address any risk of violation of the conduct and shall implement appropriate corrective actions.