



LEDiL Supplier code of Conduct		Page 1 (9)
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Ledil Group (Including all subsidiaries)	Prepared by: Mika Simonen	
	Approved by: Board of directors	

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1. PURPOSE AND OBJECTIVE

LEDiL Oy and its affiliates have committed to sustainable and responsible operation throughout the value chain. LEDiL Code of Conduct establishes the Ledil company standards for ensuring safe working conditions, equal and respectful treatment of workers, and environmentally responsible and ethically conducted business operations. Our code of conduct and related policies are applied throughout our own, and our subcontractors' operations, building the foundation for Ledil sustainable performance. We require our suppliers and other business partners to comply with applicable national and international laws and regulations, as well as internationally recognized human rights, and we expect them to follow equivalent ethical business standards as stated in this LEDiL Supplier Code of Conduct, which also describes the requirements that LEDiL has for its sustainable procurement.

Suppliers are obliged to implement the principles of this Code in all their business activities. Suppliers shall also comply with any additional requirements agreed in the contract documents. Suppliers are expected to have appropriate management systems in place to ensure compliance with this Code. Suppliers are also responsible for ensuring and monitoring their sub-suppliers' compliance with the principles of this Code.

This Supplier Code of Conduct aims to set clear expectations regarding, human- and labor rights, ethical business conduct, and environmental responsibility based on internationally recognized guidelines and standards, including but not limited to:

- the UN Guiding Principles on Business and Human Rights
- the ILO Core Conventions
- the OECD Guidelines for Multinational Enterprises
- the Paris Agreement
- the UN Global Compact

Where this Supplier Code of Conduct imposes requirements that go beyond legal obligations, suppliers are expected to meet these requirements. Furthermore, suppliers are expected to take reasonable measures to address risks of violations within their operations and their supply chain.

1. HUMAN RIGHTS AND LABOR STANDARDS

Suppliers shall respect the human rights of workers, and to treat them with dignity and respect as understood by the international community in accordance with "The universal declaration of human rights" and "The ILO core conventions on labor rights including prohibition of forced labor, child labor, discrimination, and other human rights violations".

1.1. Working conditions

Suppliers shall ensure that working hours, wages, and overtime compensation comply with applicable

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national laws and collective agreements or align with common practice within the local industry. Overtime must be voluntary, agreed upon in mutual consensus between the employee and the employer, and exercised under exceptional circumstances only. Employees are entitled to at least one day off per week (ILO Convention No. 14).

Suppliers are required to pay a living wage, meaning the salary must be sufficient to meet the employees' basic needs, such as food and housing. Where international regulations provide stronger protection for individuals than national laws or regulations, suppliers shall seek to comply with the principles of the international regulations. Prior to employment, employees shall receive a copy of the signed labor contracts including information regarding employment terms, including compensation and pay conditions. Each time wages are paid, employees shall be provided payslip stating the different parts of the salary, including overtime compensation, hours worked, bonuses and deductions.

The supplier shall act in accordance with the applicable statutory and international standards regarding occupational health and safety and provide a safe, clean and secure working environment, including measures to prevent work-related injuries and promote employee well-being. Suppliers are expected to take the necessary steps to prevent accidents and protect the health, safety, and well-being of their workers. The supplier shall establish a reasonable occupational health & safety management system.

1.2. Forced labor

Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or human trafficking shall not be used or accepted (ILO conventions No. 29 and 105). All work must be voluntary, and workers shall be free to leave work at any time or to terminate their employment. Moreover, Suppliers shall have procedures in place to identify and address risks of forced labor within its own operations and in the supply chains

1.3. Child labor

Suppliers shall actively prevent child labor in their operations and supply chains. Furthermore, suppliers shall comply with applicable age requirements, based on national laws and international standards. The stricter standards shall apply, including those set out in the UN Convention on the Rights of the Child, ILO Convention No. 138 on Minimum Age, and ILO Convention No. 182 on the Worst Forms of Child Labor.

Child labor under the age of 15 (or 14 where the law of the country permits), is not to be used in any stage of manufacturing. Workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers.

Suppliers shall have procedures in place to identify and address the risks of child labor within their own operations and in the supply chains of high-risk suppliers. If child labor is detected, suppliers must take actions to remedy the situation and to protect the rights of the child.

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1.4. Disciplinary actions

Suppliers shall treat their employees with respect and dignity. No employee shall, under any circumstance, be subject to corporal punishment or other forms of physical, sexual, or psychological disciplinary action or coercion. Additionally, deduction from wages is not permitted as a disciplinary measure unless expressly permitted by applicable law, clearly regulated in a collective agreement or employment contract. Deductions from wages must never be used in a way that could be considered coercive, abusive, or disproportionate. Deductions must be transparent and communicated in advance.

Disciplinary actions shall be documented and carried out in accordance with applicable labor laws and good market practices.

1.5. Discrimination

Suppliers shall uphold and foster an inclusive workplace free from discrimination and harassment. Discrimination or harassment includes but is not limited to gender, sexual orientation, religious beliefs, political affiliation, age and disabilities. Hiring, promotion, wages, and training opportunities shall be equitable.

Harassment and abuse, including physical, verbal, psychological, and sexual discrimination, is prohibited.

1.6. Freedom of association and collective bargaining

Suppliers shall respect their employees' right to organize and engage in collective bargaining in accordance with applicable laws and regulations. The right to collective bargaining must be respected, and suppliers shall engage in good faith negotiations with employees' representatives to ensure fair and just employment conditions.

2. ENVIRONMENT AND SUSTAINABILITY

Suppliers shall manage their environmental impact in a responsible and proactive manner. Beyond legal compliance, suppliers are expected to take continuous and reasonable actions to minimize their environmental footprint, including reducing greenhouse gas emissions, preventing pollution, using natural resources efficiently, protecting biodiversity, and minimizing negative impacts on surrounding ecosystems. In addition, suppliers are encouraged to work towards long-term sustainability goals aligned with global frameworks such as the Paris Agreement and the UN Sustainable Development Goals (SDGs).

2.1. Environmental laws, regulations, permits and reporting

The supplier shall comply with all applicable environmental laws and regulations. The supplier ensures that all required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept up-to-date, and their operational and reporting requirements are to be met.

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2.2. Responsible resource management

The supplier shall minimize environmental pollution and make continuous improvements to reduce or eliminate solid waste, wastewater and air emissions by implementing appropriate conservation measures in their production, maintenance, and facility processes.

The supplier shall strive to continuously reduce the carbon footprint of its operations through actions such as improving energy efficiency, sourcing renewable energy and eliminating, reducing and recycling waste.

2.3. Waste and chemical management

Suppliers shall have effective procedures to handle chemicals and waste safely. This includes compliance with applicable material restrictions (such as REACH; Registration, Evaluation, Authorisation and Restriction of Chemicals), maintaining documentation of relevant material information (e.g. safety data sheets), reporting and providing information on conflict minerals, managing and disposing of hazardous waste responsibly, and implementing emergency procedures to prevent or minimize health and environmental impacts.

Chemicals and other materials posing a hazard if released into the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or re-use and disposal.

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

2.4. Responsible sourcing and Conflict minerals

The suppliers shall have a policy to reasonably assure, that the tantalum, tin, tungsten and gold in the products they manufacture or provide, does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. The parties shall exercise due diligence in ascertaining the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

3. BUSINESS ETHICS

Supplies shall conduct its operations with ethical standards and in compliance with international trade regulations and export control laws. Suppliers are expected to implement procedures and processes that promote transparency and ensure that no documents related to the supplier's performance under this Code of Conduct are falsified or manipulated. Furthermore, suppliers shall respect intellectual property rights and take all necessary measures to protect confidential information from theft, fraud, and unauthorized disclosure. Invoices and supporting documentation must be accurate, complete, and properly reflect the true nature of



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business transactions. Taxes and other financial obligations must be paid in a timely manner, in compliance with relevant laws and regulations

3.1. Business integrity

Corruption, including bribery, embezzlement, abuse of power and obstruction of justice is prohibited. No agreements should be entered into that distort competition or exploit a dominant market position. Suppliers shall implement risk management and compliance frameworks to prevent corrupt practices and ensure adherence to international anti-corruption standards.

3.2. Conflict areas and export controls

Suppliers must ensure that none of its business activities contribute to or support war, conflicts, extremism, money laundering, drug trade, illegal arms trafficking, or human trafficking.

Moreover, suppliers must comply with relevant international sanction programs issued by the European Union, the United Nations, and other applicable authorities, as well as international regulations concerning export control.

3.3. Conflicts of interest

Suppliers shall avoid conflicts of interest that may compromise the credibility and integrity of the supplier or their relationship with LEDiL. Suppliers are expected to actively prevent, manage, and disclose actual or potential conflicts of interest to LEDiL without delay. This includes situations where employees or executives have personal, financial, or professional interests that may affect their impartiality. Particular attention should be paid to transactions, partnerships, or other interactions that could give rise to undue influence, favoritism, or biased decision-making.

Additionally, suppliers shall not engage in price-fixing, market division, price manipulation of resellers, hindering innovation, or other anti-competitive practices that violate applicable competition laws and regulations.

Suppliers are expected to conduct their business in a manner that supports fair competition and adheres to the standards of ethical business conduct. This includes avoiding collusion or agreements that could harm market competition

3.4. Intellectual property

The supplier shall respect LEDiL group's intellectual property rights and protect the LEDiL Group's business and trade secrets from any misuse, theft, fraud or improper disclosure. Transfer of technology and know-how is to be done in a manner which protects intellectual property rights. Supplier shall handle data with the utmost care, ensuring transparency, privacy and security. Supplier shall use data and current and emerging technology, such as Artificial Intelligence (AI), responsibly.

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4. WHISTLEBLOWER SYSTEM

Suppliers are expected to report known or suspected violations of this Supplier Code of Conduct to LEDiL through the whistleblower hotline: <https://report.whistleb.com/en/ledil>. Reports will be handled confidentially. Retaliation against individuals who raise concerns or report suspected violations is not tolerated.

5. COMPLIANCE AND MONITORING

Suppliers are required to read, understand, and comply with this Code of Conduct as a condition for doing business with LEDiL. Suppliers are responsible for communicating the requirements to relevant subcontractors and shall have procedures in place to ensure compliance. Suppliers shall protect personal data and confidential information and comply with applicable data protection laws, including GDPR where relevant.

Upon request, suppliers must be able to demonstrate how the requirements are being met, and LEDiL reserves the right to conduct follow-up – including site visits or audits – either independently or through a third party. Audits will be carried out with reasonable notice. Suppliers shall maintain records of relevant documents that demonstrate compliance with this Supplier Code of Conduct.

If deficiencies are identified, LEDiL may request that the supplier develop and implement a corrective action plan within a mutually agreed timeframe. LEDiL reserves the right to monitor progress and verify the implementation of corrective actions through follow-up assessments or other appropriate measures.

Supplier-specific sustainability requirements and goals may be defined in commercial or contractual agreements in addition to this Code.



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CONFIRMATION OF COMPLIANCE

We, the undersigned, hereby confirm on behalf of our company ("Supplier") that:

1. We have received, read, and understood the contents of this Supplier Code of Conduct.
2. By signing this document, we commit to complying with the requirements set forth herein and to using our best efforts to implement these principles throughout our operations and value chain.
3. This confirmation is subject to the same governing law as the commercial agreement between the Supplier and the relevant LEDiL company. In the absence of such specification, the law of the domicile of the purchasing LEDiL affiliate shall apply.

Name of Company	Name of Company LEDiL Oy
Place / Date	Place / Date
Authorized Signatory	Authorized Signatory
Name / Title	Name / Title