



## MSK Group's Code of Conduct

MSK Group is committed to high standards of integrity and sustainability. We have a 'zero tolerance' policy when it comes to unethical business behavior, such as bribery, corruption and forced labor.

This MSK Group's Code of Conduct defines the main principles in our business activities.

### A. Human rights

At MSK we

- Respect the personal dignity, privacy and rights of each individual;
- Refuse to make any person work against his or her will; and
- Prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

### B. Fair labor conditions

At MSK we ensure fair labor conditions. In particular, we

- Refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation;
- Respect the rights of employees to freely associate and bargain collectively;
- Not tolerate or use child labor in any stage of our activities other than in accordance with all applicable laws and regulations;
- Not use any forced labor, including but not limited to involuntary prison labor, victims of slavery and human trafficking and allow all employees the choice to leave their employment freely upon reasonable notice;
- Compensate employees fairly and follow local wage regulations and / or collective agreements;
- Ensure that working hours, including overtime, do not exceed applicable legal requirements, and
- Ensure that employees are allowed day offs according to the law.



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### **C. Health, safety and environmental management**

At MSK we provide a safe and healthy workplace for all of our employees and we will conduct our business in an environmentally sustainable way. In particular, we

- Formally appoint a competent person to manage health, safety and environmental programs and improvements;
- Have an appropriate organizational structure and procedures for the effective management of health, safety and environmental risks; and
- Ensure that all employees are sufficiently aware of these risks and appropriately trained on the implementation of control measures.

### **D. Material compliance and conflict minerals**

At MSK, we are determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals. Therefore, we ensure that the goods provided to MSK are in compliance with requirements covered under the scope of all relevant regulations. In particular, we implement a policy regarding conflict minerals and exercise due diligence to investigate the source of these minerals.

### **E. Business ethics**

At MSK we conduct our business in an ethical manner. In particular, we

- Refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers, government officials and any other party are in compliance with applicable anti-bribery laws;
- Adhere to anti-trust and other competition laws;
- Protect all confidential information provided by our respective business partners;
- Respect intellectual property of others; and
- Adhere to international trade regulations and export control regulations.



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## F. Secure business

At MSK we conduct our business in a secure manner. In particular, we

- Implement reasonable measures for minimizing exposure of MSK to security threats such as cyberattacks, terrorism, crime, pandemics and natural disasters; and
- Demand that people visiting or working at MSK-companies, will follow the MSK's security procedures and report any security concerns to the appropriate channels.

## G. Grievance/complaint procedure

Any employee who becomes aware of a violation of applicable law or of this Code should report that information immediately to his or her manager. If for any reason employee does not feel comfortable speaking with his/her manager or his/her manager is involved in the situation, or is conflicted in any other way, the situation is to be reported to other manager. Violations of applicable law or of this Code can also be reported through MSK's Whistleblowing-form (webpage) or Granite-work safety system.

## H. Managing the Compliance in Value Chain

At MSK we expect our Customers and Suppliers to respond in a timely manner to our requests for evidence of their compliance with these requirements.

Kauhava 19.3.2024

Timo Lehtioja  
Group CEO





Our Code of Conduct is guided by the following international initiatives and framework:

- The Principles of the UN Global Compact:  
<https://unglobalcompact.org/what-is-gc/mission/principles>
- The UN Sustainable Development Goals:  
<https://sdgs.un.org/goals>
- The UN Guiding Principles on Business and Human Rights:  
[https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf)
- The ILO Declaration on Fundamental Principles and Rights at Work:  
<https://www.ilo.org/declaration/lang--en/index.htm>
- Energy Efficiency Conventions implementing the EU Energy Efficiency Directive:  
[https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficiency-targets-directive-and-rules/energy-efficiency-directive\\_en](https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficiency-targets-directive-and-rules/energy-efficiency-directive_en)



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