



Code of Conduct

10.8.2026



Since 1954

1. Introduction

This is made for Sähkölehto Oy as a Trading and Distribution Company for main product groups in Machine Safety, Automation and Connector Products

2. Purpose

This Code of Conduct establishes ethical, legal, and professional standards for all employees, managers, directors, contractors, and representatives of **Sähkölehto Oy**.

As a buyer and distributor of Machine Safety, Automation, and Connector products, our role is to purchase products from manufacturers and suppliers and provide value-added solutions to industrial Business-to-Business (B2B) customers. We are committed to conducting business with integrity, transparency, professionalism, and respect for all stakeholders.

This Code of Conduct is based on and aligned with internationally recognized principles, including:

- The UN Universal Declaration of Human Rights
- The ILO Declaration on Fundamental Principles and Rights at Work and the ILO Core Conventions
- The ten principles of the UN Global Compact
- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights

3. Our Core Values

We commit to:

- integrity in every business decision.
- safety as a fundamental business priority.
- customer focus and service excellence.
- fair and ethical competition.
- quality and reliability.
- sustainability and responsible sourcing.
- compliance with laws and regulations.
- continuous improvement and innovation.

4. Compliance With Laws and Regulations

All employees and representatives shall:

- comply with applicable local, national, and international laws.
- follow product safety, electrical safety, machine safety, environmental, and trade regulations.
- respect competition and antitrust laws.
- comply with export control and sanctions regulations.
- adhere to data protection and privacy regulations.

No employee may knowingly participate in activities that violate legal requirements.

5. Business Ethics and Integrity

We conduct business honestly and fairly.

Employees shall:

- act truthfully in all business communications.
- avoid deceptive or misleading practices.
- maintain accurate records.
- never falsify documents, certifications, testing reports, or financial information.
- protect the reputation of the company and its partners.

We do not participate in or facilitate money laundering, terrorist financing, or unlawful tax evasion. All transactions are properly recorded and reported in accordance with applicable law.

If employees become aware of material non-public information concerning a customer, supplier, or other listed company, such information must not be shared or used for trading in securities.

6. Anti-Bribery and Anti-Corruption

The company maintains a zero-tolerance approach to corruption.

Employees shall not:

- offer, promise, or provide bribes.
- accept improper payments or favors.
- giving gifts intended to influence purchasing decisions.
- receive personal benefits from suppliers or customers.

Business gifts and hospitality must:

- be reasonable and infrequent.
- comply with applicable laws.
- be transparent and properly documented.

7. Fair Purchasing Practices

As a buyer organization, we are committed to ethical procurement.

We will:

- select suppliers objectively.
- evaluate suppliers based on quality, safety, service, technology, sustainability, performance, ethics, and total cost of ownership.
- treat all qualified suppliers fairly.
- avoid favoritism and conflicts of interest.
- promote long-term partnerships with responsible manufacturers.

Purchasing decisions shall never be influenced by personal interests.

8. Supplier Standards

We expect manufacturers and suppliers to:

- operate legally and ethically.
- respect human rights.
- prohibit child labor and forced labor.
- provide safe working conditions.
- comply with environmental legislation.
- maintain product quality and traceability.
- comply with machine directives, machinery regulations, CE requirements, ROHS, REACH, and other applicable standards.

Sähkölehto Oy reserves the right to review supplier compliance and discontinue cooperation with suppliers that violate these principles.

Conflict Minerals

As a distributor, Sähkölehto Oy does not manufacture products or source raw materials directly.

- We expect the manufacturers we represent to conduct due diligence on the origin of tin, tantalum, tungsten, and gold (3TG) in line with the OECD Due Diligence Guidance.
- We expect the manufacturers we represent to ensure that these minerals do not originate from sources that finance armed conflict.
- Upon request, we will obtain and forward manufacturers' conflict minerals declarations (e.g. CMRT) to our customers.
- We give preference to established manufacturers with publicly available sustainability and compliance commitments.
- If we become aware of a supplier violating these principles, we will address the matter with the supplier and, where violations are not corrected, discontinue the cooperation.
- Upon to customer request, we will provide available information on the origin of products, including country of origin, certificates of origin, and manufacturers' material and compliance declarations (e.g. RoHS, REACH, Declaration of Conformity).

9. Product Safety and Technical Responsibility

Because we supply machine safety and automation products, safety is a critical responsibility.

We will:

- supply only approved and compliant products.
- maintain technical competence regarding products sold.
- provide accurate product information.

- support customers in the safe application of products.
- report product defects or safety concerns promptly.

Employees shall never knowingly sell products that compromise safety or regulatory compliance.

10. Customer Commitment

We strive to build long-term customer relationships based on trust.

We will:

- provide professional technical advice.
- deliver accurate quotations and specifications.
- respond promptly to customer inquiries.
- protect confidential customer information.
- resolve complaints fairly and efficiently.

11. Conflict of Interest

Employees shall avoid activities that create actual or perceived conflicts between personal interests and company interests.

Examples include:

- personal financial interests in suppliers or customers.
- favoring relatives or friends in purchasing decisions.
- receiving unauthorized gifts or benefits.
- using company opportunities for personal gain.
- potential conflicts must be disclosed to management immediately.

12. Confidentiality and Information Security

Employees must protect:

- customer information.
- supplier information.
- pricing agreements.
- technical documentation.
- commercial strategies.
- intellectual property.

Confidential information shall only be shared with authorized people who require it for legitimate business purposes.

Data Protection and Information Security Sähkölehto Oy processes personal data in accordance with the EU General Data Protection Regulation (GDPR) and Finnish data protection legislation. Personal data is used only for legitimate business purposes.

We protect customer and supplier data with appropriate technical and organisational measures, and we notify affected parties and authorities of data breaches as required

by law. We continuously develop our data protection and information security practices as regulation and customer requirements evolve.

All employees are bound by the confidentiality obligations set forth in their individual employment contracts.

13. Labor and Human Rights

Sähkölehto Oy respects internationally recognized human rights as defined in the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

As a company operating in Finland, we comply with Finnish labour legislation and applicable collective agreements, which meet or exceed international standards.

We commit to the following in our own operations:

- No use of child labor. We do not employ people under the age of 15, and employees under 18 are not assigned hazardous work.
- No use of forced, bonded or involuntary labor in any form. All employment is freely chosen, and employees are free to terminate their employment in accordance with the agreed notice period. We never retain employees' identification documents or charge recruitment fees.
- All employees have a written employment contract and are paid at least in accordance with Finnish law and the applicable collective agreement, including overtime compensation and statutory benefits.
- Working hours comply with Finnish law and collective agreements, including rest periods.
- We respect employees' freedom of association and the right to collective bargaining.

14. Respectful workplace

The company is committed to:

- equal opportunity.
- diversity and inclusion.
- mutual respect.
- professional behavior.

We prohibit:

- harassment.
- discrimination.
- bullying.
- retaliation.

All employees deserve a safe and respectful work environment.

15. Occupational Health and Safety

Sähkölehto Oy provides a safe and healthy working environment for all employees in accordance with the Finnish Occupational Safety and Health Act.

We commit to:

- identifying and assessing workplace risks and taking preventive measures, including in warehouse and logistics operations.
- providing statutory occupational health care for all employees.
- ensure employees receive appropriate safety instructions and training for their tasks.
- investigating accidents and near misses and implementing corrective actions.
- maintaining adequate accident insurance for all employees as required by law.

16. Environmental Responsibility

We support sustainable business practices.

We will:

- promote energy-efficient technologies.
- encourage environmentally responsible sourcing.
- reduce waste and unnecessary consumption.
- comply with environmental legislation.
- support circular economy principles where practical.

17. Quality and Continuous Improvement

We are committed to:

- maintaining high service quality.
- improving operational processes.
- monitoring supplier performance.
- developing employee competence.
- developing continuously our operations through ongoing dialogue with customers and suppliers.

18. Reporting Concerns

Employees are encouraged to report:

- legal violations.
- ethical concerns.
- safety risks.
- fraud.
- corruption.
- conflicts of interest.

Reports may be made without fear of retaliation. All concerns will be investigated fairly and confidentially.

Concerns may be reported by employees as well as by suppliers, customers, and other third parties. Reports can be submitted anonymously by mail to:

Sähkölehto Oy / Ethics
Holkkitie 14
00880 Helsinki, Finland

All reports are handled confidentially. We do not tolerate retaliation against anyone who reports a concern in good faith.

19. Management Responsibilities

Managers shall:

- lead by example.
- promote ethical behavior.
- enforce this code of conduct.
- ensure employees receive appropriate training.
- address violations promptly and consistently.

We do not participate in or facilitate money laundering, terrorist financing, or unlawful tax evasion. All transactions are properly recorded and reported in accordance with applicable law.

If employees become aware of material non-public information concerning a customer, supplier, or other listed company, such information must not be shared or used for trading in securities.

20. Compliance Acknowledgement

All employees, managers, contractors, and representatives are expected to understand, follow, and uphold this Code of Conduct.

Failure to comply with may result in disciplinary action, termination of employment, termination of contracts, or legal action where appropriate.

21. Approvals

In Helsinki, 10.8.2026

Miika Lehto
Managing Director

Juuso Lehto
Sales Director

Effective Date:	10.8.2026
Last Review Date:	10.8.2026

