



# Brightplus

CODE OF CONDUCT



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# CODE OF CONDUCT

Those who work at Brightplus know that we strive to always do our best. Our success is not just a factor of our technology and our employees: it is also the result of the trust we have built with customers and partners. Maintaining this trust requires us to operate with the highest ethical standards and to do what's right. This Code of Conduct is a roadmap for navigating the decisions we face every day – to make the right choices for our customers, our employees, our community and the environment. It sets out basic principles and provides an overview of the laws, regulations, and company policies that apply to us and our work.

We are a team that values inclusion and collaboration, while demonstrating integrity, trust, respect and empathy. We take care of ourselves, each other, our community and our environment. Working to ensure that everything we do contributes to a better future for Brightplus and a better future for our society.

Our mission begins with every Brightplus employee demonstrating trustworthiness in their day-to-day work. This means doing what's right, no matter who is watching and even when it's hard. Only by doing this can we create the necessary level of trust for Brightplus to change the world — trust with one another, our customers, and other stakeholders.

We expect everyone at Brightplus to be treated with respect and dignity. So, we must all create and maintain a respectful and inclusive workplace. We do not tolerate bullying at any level of the organization (whether physical, verbal, or visual). We proudly employ people of all backgrounds who possess the energy and drive to accelerate our vision forward. As with trustworthiness, hiring those committed to excellence—no matter where they come from, look like, or the beliefs they hold—is essential to achieving our mission. We do not discriminate against anyone, at any time, and provide equal opportunities to all.

Our Code of Conduct is at the centre of everything we do. It goes beyond policies, rules, and laws to provide guidance for behaving ethically and responsibly. Behaving ethically and responsibly means doing the right thing in all situations.

It is the responsibility of all stakeholders in the organisation not only to behave in a manner that aligns with the core principles but also to speak up when they see anything that falls short of these expectations.



# COMPANY

## GENERAL PRINCIPLES

- Business decisions must be made on an informed basis, in good faith, and in the honest belief that the action taken is in the best interest of Brightplus; that such decisions will not violate any applicable law, regulation or internal rule or policy; and that no personal interest or self-dealing is involved.
- Brightplus is committed to being a responsible, global citizen through its provision of meaningful employment, payment of taxes, and social responsibility.

## ANTI-BRIBERY AND ANTI-CORRUPTION

- Brightplus prohibits corrupt practices in any form, including bribery and other unlawful payments. Brightplus personnel may not make any payment or provide any gifts, entertainment or other business amenity to individuals employed by current or prospective customers, suppliers or other business partners for improperly influencing them to obtain or retain business, or to secure any improper business advantage. In addition, Brightplus personnel may not accept any payment or any gifts, entertainment or any other business amenity that appears to influence their business decisions.
- We will observe applicable laws and regulations, as well as our internal rules and policies with respect to giving and receiving gifts, entertainment and other benefits.

## WHISTLEBLOWER PROCEDURE FOR STAKEHOLDERS TO REPORT CORRUPTION AND BRIBERY

- If you become aware of any situation that you believe breaches Company policy or the Code of Conduct, you should raise your concerns with either your line manager, any member of the Executive Committee, or any member of the Board.

## FAIR COMPETITION AND PROCUREMENT

- Brightplus's policy is to comply with all applicable antitrust, competition and fair trade laws and regulations of each country and region where we conduct business. These laws and regulations are designed to prohibit agreements or practices that fix prices, divide markets, limit production or otherwise impede or destroy fair competition in markets.
- We select our suppliers and contractors on the basis of competitive price, quality, delivery and other objective standards. Brightplus expects its suppliers and contractors to adhere to our ethical values and comply with policies concerning compliance with laws, respect for human rights, fair labour and employment practices, environmental conservation and the safety of products and services.



# OPERATIONAL RESILIENCE

Brightplus Oy is committed to maintaining resilient business operations and managing risks that may affect the continuity of its services, projects and customer commitments.

The Company identifies and evaluates relevant operational risks, including natural hazards, infrastructure disruptions, utility outages, logistics disruptions and other external events that may affect business activities. Appropriate preventive and mitigation measures are implemented in proportion to the Company's size and operational profile.

Brightplus seeks to ensure continuity of critical operations through planning, backup arrangements, remote working capabilities and alternative communication methods where appropriate.



Brightplus personnel are always expected to use good judgment and act in accordance with company policies, and the law.

#### DIVERSITY, EQUITY & INCLUSION

- Brightplus strives to promote diversity. We seek to create a culture that allows all personnel to contribute their unique talents and skills so as to provide the best products and services to our customers. We are committed to recruiting, hiring, training, promoting and otherwise treating applicants and employees without discrimination.

#### CAREER AND TRAINING

- Brightplus has a workplace where everyone feels welcome and we provide training and education to keep them safe and help everyone give their best.

#### WORKING CONDITIONS

- Brightplus commits to uphold the human rights of employees. This applies to all employees including temporary, migrant, student and contract employees as well as direct employees. Employees shall be treated with dignity and respect at all times.
- We are committed to maintaining a healthy, safe and productive work environment that is free from discrimination or harassment, in which all individuals are treated with respect and dignity. We will not tolerate any form of discrimination, or harassment of any kind, including sexual harassment, bullying or other behaviours that create a hostile work environment. We will also adhere to all applicable health and safety laws and regulations as well as internal rules and policies to help ensure workplace safety.
- Brightplus does not allow any form of retaliation against anyone for making a good faith report or for participating in an investigation of a report. Anyone who makes a good faith report will be treated fairly and respectfully.
- The foundations for our actions and behaviour – internally and externally – are honesty, openness and transparency. Different opinions are respected, and people are encouraged to question the decisions of others.



#### REEDOM OF ASSOCIATION

- Brightplus grants its employees the rights to associate freely, form and join employees organizations, seek representation, and bargain collectively in accordance with applicable laws and regulations. Employees who choose to belong to trade unions - subject to laws and regulations - shall be free of pressure or influence. Where the right to freedom of association and collective bargaining is restricted under law, Brightplus shall not hinder the development of parallel means for independent and free association and bargaining. Information security.

#### WORK CONTRACTS AND TERMS OF EMPLOYMENT

- For every employee, a written contract will state the terms of employment. Employment contracts specify all pivotal information, such as information related to occupational hazards if applicable. Contracts shall be in a language understood by the employees. Brightplus will ensure that the employees have understood the contract, signed the contract, and been given a copy of the contract.
- The policy of terminating the employment contract shall be fair relative to the nature and duration of the employment and in compliance with applicable legislation. Brightplus will not tolerate any sort of discrimination or unfair punishment regarding to employment practices. Only employees with a legal right to work shall be employed. Employees' legal status to work will be validated by reviewing original documentation before commencement of work.

#### WORKING HOURS AND REST DAYS

- Working hours or overtime hours should not exceed the maximum permitted by applicable laws, industry benchmark standards or collective agreements. Daily working hours will not exceed 12 hours of work in any period of 24 consecutive hours. Weekly working hours shall not exceed 60 hours including overtime in normal circumstances. Whichever of the option is stricter applies.
- Overtime shall always be voluntary, exceptional and employees shall be given reasonable notice for overtime. During working hours, regular and appropriate break periods shall be provided, with the minimum requirement being appropriate meal and refreshment breaks. Employees shall be given at least one day off in every seven days. Employees shall be entitled to vacation, leave time, statutory holidays and maternity and paternity leaves according to applicable local laws and regulations.



## WAGES AND OTHER BENEFITS

- At a minimum, wages shall comply with the national laws, or industrial standards, or binding collective agreements, whichever is higher. Brightplus will entitle its employees to at least the legal minimum wage and all legally mandated benefits so that the wage is sufficient to provide basic needs for employees, and their entitled official dependents. As mandated by applicable laws and regulations, all social security and insurance benefits shall be paid, and overtime shall be compensated at the premium rate.
- Deductions from wages will be permitted only subject to conditions prescribed by law or fixed by collective agreement. Brightplus will not make deductions for disciplinary purposes. In case of allowance deductions, for example food and accommodation, Brightplus will clearly communicate principles to employees, and the amount of deductions shall be reasonable when compared to the total wage.
- Brightplus will pay employees regularly, at least monthly and on time, clearly conveying the basis for which employees are being paid. Employees shall receive pay slips clearly stating at least hours worked, wage, and all deductions taken. A system is in place to verify and accurately record payroll, deductions and the hours worked by employees. Wages and benefits shall be paid either in cash, by cheque or bank transfer. Child labour and protection for young employees
- Brightplus is strictly against the use of child labour, in line with conventions on minimum age for employment in accordance with applicable national laws and regulations or the age for completing compulsory education in that country in accordance with applicable national laws and regulations, whichever is higher.
- Brightplus does not employ workers, especially young above the minimum age but under the age of 18, to perform any work that is likely to jeopardise their education, health, safety or morals.

## PREVENTION OF FORCED LABOUR

- Any form of forced, bonded, indentured, or involuntary prison labour must not be used in any circumstances. All work shall be voluntary, and employees shall be free to leave work or terminate their employment upon reasonable notice. As a condition of employment, no one has the right to require employees to surrender government-issued identification, passport, work permits, or any other unreasonable deposits.
- Employees shall not be threatened in any way or subject to any sort of harsh or inhumane treatment, which includes, but is not restricted to, mental or physical coercion, sexual harassment or abuse, corporal punishment, verbal abuse, or unreasonable restrictions regarding entering or exiting company provided facilities.



# HUMAN RIGHTS POLICY

## PURPOSE

Brightplus is committed to respecting and promoting internationally recognized human rights throughout our operations, business relationships, and supply chain. We believe that treating people with dignity, fairness, and respect is fundamental to our business success and to creating a positive impact on society.

This policy complements the Brightplus Code of Conduct and applies to all employees, directors, officers, contractors, and business partners acting on behalf of Brightplus.

## OUR COMMITMENT

Brightplus supports the principles contained in internationally recognized human rights standards, including:

- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The Universal Declaration of Human Rights
- The International Labour Organization (ILO) Core Conventions
- Applicable national laws and regulations in the countries where we operate

We are committed to conducting our business in a manner that respects human rights and avoids causing, contributing to or being directly linked to adverse human rights impacts.

## KEY HUMAN RIGHTS PRINCIPLES

Brightplus is committed to:

### EQUAL OPPORTUNITY AND NON-DISCRIMINATION

- Providing a workplace free from discrimination, harassment, bullying, and retaliation. Employment-related decisions are based on qualifications, performance, and business needs, regardless of race, ethnicity, nationality, gender, age, religion, disability, sexual orientation, political opinion, or other protected characteristics.

### SAFE AND HEALTHY WORKING CONDITIONS

- Maintaining a safe, healthy, and respectful work environment and complying with applicable health and safety requirements.



# HUMAN RIGHTS POLICY

## FREEDOM OF ASSOCIATION

- Respecting employees' rights to freedom of association, collective bargaining, and employee representation in accordance with applicable laws.

## PROHIBITION OF FORCED LABOUR

- Prohibiting all forms of forced, bonded, trafficked, involuntary, or prison labour. All employment must be freely chosen.

## PROHIBITION OF CHILD LABOUR

- Prohibiting child labour and complying with applicable minimum age requirements and international labour standards.

## FAIR WORKING CONDITIONS

- Providing fair wages, working hours, benefits, and employment conditions in accordance with applicable laws and regulations.

## SUPPLY CHAIN EXPECTATIONS

- We expect our suppliers, contractors, and business partners to operate in a manner consistent with the principles of this policy and the Brightplus Code of Conduct. We encourage business partners to respect human rights, provide fair working conditions, and comply with applicable labour, health and safety, and environmental laws.

## REPORTING CONCERNS

- Brightplus encourages employees and stakeholders to raise concerns regarding potential violations of this policy, the Code of Conduct, or applicable laws. Reports may be made through established reporting channels. Retaliation against anyone who raises a concern in good faith is strictly prohibited.

## GOVERNANCE AND REVIEW

- Responsibility for implementing this policy rests with Brightplus management. We will periodically review this policy and our related practices to support continuous improvement in our approach to human rights.



# SAFETY AND HEALTH

## EMPLOYEE HEALTH & SAFETY

- Through robust safety management systems, we are committed to safeguarding the health and safety of all employees, visitors and contractors. We will never compromise this for production or profit.

## USE OF HAZARDOUS SUBSTANCES AND WASTE MANAGEMENT

- At Brightplus we ensure all our products comply with relevant regulations and are safe throughout their life cycle. We identify hazardous materials, chemicals and substances to ensure their safe handling, movement, storage, recycling, reuse and disposal. All related applicable laws and regulations are strictly followed. Key employees are aware of and trained in product safety standards.



# CONFLICT MINERALS

Brightplus is committed to ensuring conflict free sourcing within its supply chain. Any sources of 'Conflict Minerals' are only from regions which are not determined by any governing body to be conflict regions or from mines or smelters within such conflict regions which have been certified as 'conflict free' by an independently accredited third party.



# SUSTAINABILITY

- Brightplus recognizes the importance of preserving the environment and creating a quality of life for all humanity and for future generations to come. We will endeavour to evaluate and implement programmes that meet or exceed legal requirements, and consider environmental impact as a fundamental criterion when evaluating projects or operations.
- We do our best not only in our manufacturing but also in our efforts to design products that help protect the environment.
- Brightplus is committed to being the most sustainable supplier of innovative materials, while minimising any negative impact from our operations and associated supply chains. We will create and deliver materials to tackle some of the world's biggest challenges and have a positive impact on the environment and society.
- We collaborate with stakeholders up and down the value chain to advance the sustainability agenda and demonstrate leadership.

# INFORMATION SECURITY

## PERSONAL DATA & PRIVACY

- We respect the privacy of individuals, customers, business partners and Brightplus personnel. We will observe and comply with all applicable laws and regulations as well as applicable internal rules and policies whenever collecting, maintaining, using, disclosing or disposing of personal information.

## INFORMATION SECURITY AND CYBERSECURITY

- Brightplus Oy is committed to protecting information, digital assets, intellectual property and customer data through appropriate information security and cybersecurity practices.
- The Company applies risk-based security measures including access control, multi-factor authentication, data protection, secure use of cloud services, regular software updates and backup procedures.
- Employees and partners are expected to handle information responsibly and comply with applicable data protection and confidentiality requirements.
- Brightplus continuously seeks to improve its cybersecurity capabilities in proportion to its size, business activities and risk exposure.

## CONFIDENTIAL INFORMATION & INTELLECTUAL PROPERTY

- Brightplus intellectual property is one of our most valuable assets and it differentiates us from our competitors. We will all work together to protect our intellectual property such as our patents, designs, trademarks and trade secrets. We will vigorously defend Brightplus's rights and also respect the rights of others. We will not knowingly misuse the intellectual property of others or violate their intellectual property rights.
- To the extent permitted by and subject to applicable laws and regulations, all inventions and creations generated by Brightplus personnel belong to Brightplus. We will secure Brightplus's rights to such inventions and creations in accordance with company instructions.

# INFORMATION SECURITY

## WHISTLEBLOWER PROCEDURE FOR STAKEHOLDERS TO REPORT INFORMATION SECURITY CONCERNS

- If you become aware of any situation that you believe breaches the Code of Conduct relating to information security, you should raise your concerns with either your line manager, any member of the Executive Committee, or any member of the Board.

## SOCIAL MEDIA

- The positive representation of Brightplus and everyone associated with us, via company and personal social media accounts, is a key component to maintaining the reputation of the company.
- Employees should be clear when using social media whether they are acting in a personal or professional capacity, and only use accounts on external networks designated to Brightplus if you have been authorised and trained to do so. Never disclosing company confidential or insider information.
- Never posting insulting, harassing, derogatory, libellous, obscene, sexually explicit, racist, abusive or discriminatory content.
- Obtain the express permission from any employee before posting or publishing personal information about them.



Brightplus