

BETOLAR

Supplier Code of Conduct

Betolar Plc is committed to complying with all the laws, rules, and regulations applicable to the conduct of the Group's business, as well as to exercising high standards of integrity and sound ethical judgment.

This Supplier Code of Conduct is based on the Betolar Plc Code of Conduct. Betolar Plc expects all its suppliers and business partners to operate in accordance with the requirements set forth in this Supplier Code of Conduct. The supplier shall ensure that all its employees, as well as its own suppliers and sub-suppliers, recognize and comply with these requirements.

Compliance with laws and regulations

The supplier shall use only materials and services that are not subject to export controls and/or sanctions involving any countries and shall confirm that in writing (e.g. EAR99). The supplier shall always, in particular in relation to Betolar Plc, comply with all laws, regulations and rules applicable to the supplier, origin of raw materials, manufacturing and delivery of the goods and services, including regulations and controls involving export and re-export of goods, software and technology, as well as in regard to any countries embargoed.

Human rights and workplace practices

The supplier shall support and respect the protection of human and labour rights as expressed in the United Nations' Universal Declaration of Human Rights and the Core Conventions of International Labour Organization (ILO). The supplier shall support and respect freedom from any discrimination, freedom of association, the effective recognition of the right to collective bargaining, and equality of opportunity and treatment. The supplier shall not use any form of forced or child labour. The minimum employment age is defined in accordance with local jurisdiction and international law. The Supplier shall make reasonable efforts to prevent its products from containing raw materials that directly or indirectly fund armed groups violating human rights.

Health and safety

The supplier shall commit to safety and taking all necessary steps in order to avoid damage to people or the environment, including ensuring the necessary conditions for a safe and healthy work environment for all employees. The supplier shall comply with the applicable chemical safety regulations. Supplier must control hazards, take all reasonable safety precautions, provide health and safety training, and implement an effective occupational health and safety management system.

Business conduct and relations with business partners

The supplier shall act in an ethical and responsible manner and shall compete fairly. Bribery or corruption is not tolerated in any

form. The supplier shall not engage in price fixing, market or customer allocation, market sharing or bid rigging with competitors. The supplier shall ensure that sufficient procedures for potential conflict of interest situations are in place, and that accurate accounts and records are kept of business transactions.

Supplier shall respect the intellectual property rights of others.

Environment

The supplier is expected to comply with relevant statutory and international standards related to environmental protection. The supplier shall minimize any adverse impact of its operations on the environment and demonstrate continuous improvements in minimizing these impacts. The supplier shall be continuously vigilant about updates in listings of chemical substances of concern.

Enforcement

Betolar Plc chooses its suppliers with care and on the basis of objective factors such as quality, reliability, delivery and price, in addition to ethical standards and sustainability. Betolar Plc conducts regular supplier audits and in case of violations action is taken either to allow time for corrective action or to terminate the relationship, whether under contract or general law.

Reporting misconduct

The supplier shall without delay report to Betolar Plc any observed or suspected non-compliant behaviour. The supplier shall not permit any retaliation against any individual who, in good faith, seeks advice or reports a violation or a potential violation.

Betolar Plc offers an anonymous "Report misconduct"-form at the company's website <https://report.whistleb.com/en/betolar>. Persons reporting violations in good faith will not be subject to retaliation by Betolar Plc.

Supply Chain

The Supplier shall make reasonable efforts to encourage compliance with this Code of Conduct among its suppliers and shall adhere to the principles of non-discrimination in both supplier selection and treatment.

Betolar Plc

Tuija Kalpala, President & CEO

