

ETHICAL POLICY

Date of preparation: 2.7.2024

Last updated: 16.6.2026

Reviewed: 16.6.2026

UTU is committed to upholding its ethical principles in all aspects of its operations. These principles form the foundation of how we conduct business and interact with our customers, employees, business partners, and other stakeholders. We recognize our responsibilities both as a company and as individuals towards one another and the society around us. Our operations are guided by our values: customer understanding, collaboration, strong performance, and renewal. In line with our strategy, we strive to build an equal, safe, continuously learning, and thriving UTU community.

We comply with all applicable national and international legislation, as well as regulations and guidance issued by authorities and the European Union. This includes, among others, legislation relating to equality, non-discrimination, employment, trade, and export control. We do not engage in activities that violate the law, human rights, or international agreements. We also require that our products are not used for purposes that could result in breaches of applicable laws, international agreements, or regulatory requirements.

All UTU employees are committed to complying with our Code of Conduct, and we operate in accordance with our Equality Plan. In addition, UTU has a Supplier Code of Conduct, through which we require our business partners to operate responsibly and ethically in line with our values.

UTU is committed to respecting and promoting human rights throughout its operations. Our approach is based on the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work. We respect employees' rights to freedom of association, trade union membership, and collective bargaining in accordance with applicable local legislation.

We are committed to providing fair working conditions, complying with legislation governing working hours, wages, and other terms of employment, and treating all employees fairly and equally. We do not tolerate child labour, forced labour, or human trafficking in any form. We strive to prevent human rights violations throughout our value chain and respond to any suspected violations promptly and transparently. We expect our business partners to uphold the same human rights principles.

We respect the equal worth and dignity of every individual. We do not tolerate discrimination based on gender, nationality or ethnic origin, age, religion, sexual orientation, mental or physical disability, political or other opinions, social status, family relationships, or any other personal characteristic. Harassment, discrimination, and violence of any kind are strictly prohibited, and any such incidents will be addressed without delay. We respect one another and each other's rights and are committed to fostering a safe, inclusive, and healthy working environment.

We oppose corruption in all its forms and conduct our business with integrity and transparency. We never pay, offer, request, solicit, or accept bribes or any other improper advantage. We compete fairly, avoid conflicts of interest, and comply with our established policies regarding gifts and hospitality.

Every employee and business partner is expected to report any suspected unethical or inappropriate conduct. No one will face retaliation for raising concerns in good faith. Concerns may be discussed with a manager or HR, or reported anonymously through our publicly available whistleblowing channel.

We are committed to continuously improving both as an organization and as individuals. We provide equal opportunities for professional development, learn together, share knowledge, and actively involve our employees in developing our operations. Management is responsible for implementing and monitoring this policy. We continuously evaluate and improve our practices and regularly conduct employee engagement and equality surveys to support our development. The implementation of this policy is reviewed regularly as part of management reviews.