



## Code of Conduct for Partners



# Code of Conduct for Partners

Ardor Code of Conduct for Partners is aligned with several international guidelines, including the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights, and the UN Global Compact initiative.

Awareness of and compliance with relevant legal requirements form the foundation for adherence to the Ardor Code of Conduct for Partners.

Partners must comply with all applicable laws, regulations, and practices relevant to their operations and interactions with Ardor, including all governmental contractual obligations arising from agreements made with Ardor.

They must also comply with all legislation relating to human rights, workers' rights, working conditions, health and safety, environmental protection, taxation, and anti-corruption practices, in addition to the requirements outlined in this document. Partners are required to obtain and maintain all legally mandated permits, licences, and registrations.

We expect our partners to stay informed of the latest international standards, applicable international regulations and agreements, as well as relevant regional and national legislation.

This policy applies to all Ardor partners. A "partner" refers to any business, company, corporation, individual, or other entity that sells or seeks to sell products or services to Ardor, including the partner's employees, officers, and other representatives.

The Ardor Code of Conduct for Partners covers the following areas:

## ENVIRONMENT



The optimisation of natural resource use is our responsibility.

## SOCIETY



Respect for human rights is the foundation of everything we do.

## BUSINESS INTEGRITY



High ethical standards guide our actions.

## TRANSPARENCY



A commitment to open dialogue builds trust.

# Expectations for Partners

**We expect our partners to acknowledge and implement the Ardor Code of Conduct for Partners in practice. They are fully responsible for integrating these principles comprehensively across their entire supply chain. Partners must act in accordance with these principles in all interactions with Ardor and when representing Ardor.**

The partner and its affiliates must be legally registered to operate and must obtain and maintain all necessary permits and/or licences as required by local legislation.

Where local laws or regulations provide stronger protection than the requirements of this policy, such local laws or regulations shall take precedence. Upon request, partners must be able to demonstrate compliance with local legal requirements.

It is the partner's responsibility to ensure that all subcontractors, agents, and other third parties involved in any work under an agreement with Ardor comply with this policy.

**Partners must also ensure the following requirements are met:**

## **Ardor Code of Conduct for Partners**

Partners must be familiar with the latest international standards, applicable international regulations and agreements, as well as relevant regional and national laws.

## **Internal roles and responsibilities**

Partners must establish clearly defined roles and responsibilities that align with the Ardor Code of Conduct for Partners.

## **Prevention and implementation**

Partners must implement rules, practices, and structures that ensure compatibility between the Ardor Code of Conduct for Partners and their policies and practices.

## **Awareness and know-how**

Both employees and management must understand and commit to the Ardor Code of Conduct for Partners.

## **Regular monitoring**

Partners must conduct regular internal self-assessments to ensure they maintain an accurate and up-to-date understanding of compliance.

Failure to comply with monitoring requirements may result in the partner being disqualified from conducting business with Ardor, either currently or in the future. Non-compliance may also constitute a breach of contract.

Any non-compliance identified during self-assessment must be reported immediately to the partner's designated procurement or contract contact at Ardor.

# Environment



## **Environmental policy**

Partners must have an environmental policy (a written document accessible to all stakeholders), which includes statements on pollution prevention, continuous improvement of environmental performance, compliance with legislation, and adherence to partner-specific environmental objectives. Alternatively, partners may commit to complying with Ardor's current environmental policy.

## **Environmental pollution**

Partners must operate in a manner that protects the environment and complies with all applicable environmental laws, regulations, and standards. They must also hold valid and up-to-date environmental permits.

## **Emergency plan**

Partners must have an emergency response plan that identifies all potential emergencies and outlines preparedness procedures. These procedures must be reviewed on a regular basis.

Rescue personnel and first responders must be trained to handle emergencies, provide first aid, and act as initial fire responders. Partners must ensure that first aid kits are easily accessible and that at least one trained first aid provider is always present on site.

## **Harmful substances**

Partners must monitor the use of harmful substances in their production processes, packaging materials, and procured goods (such as products, spare parts, components, materials, and substances). They must ensure compliance with applicable legislation and regulations, including Regulation (EC) No 1907/2006 (REACH), as well as any substance restrictions listed in Ardor's "black and grey" lists. These lists are updated annually according to Ardor management system and are available upon request for supplier reference.

If a partner identifies any substance from these lists in any product, process, or packaging, they must inform Ardor within a reasonable timeframe using the designated notification form available on Ardor's website.

Further information is available from your designated procurement or contractual contact person at Ardor or via our website.

## **Environmental risk management**

Partners must develop, implement, and maintain a risk-based programme to minimise or mitigate the environmental impacts of their operations, products, and services.

## ENVIRONMENT



“ Partners must operate in a manner that protects the environment and comply with all applicable environmental laws, regulations, and standards.

“ Partners must manage hazardous substances used in production processes, packaging materials, and procured goods (including products, spare parts, components, materials, and substances).

“ Partners must ensure that first aid kits are readily accessible and that at least one first-aid-trained employee is present on-site at all times.





# Social Responsibility

## Human Rights

Partners must uphold the Universal Declaration of Human Rights and the fundamental principles of the International Labour Organization (ILO), as complemented by applicable national laws.

## Freedom of Association

Partners shall respect the right of employees to form and join trade unions or similar associations, including those established for the purposes of collective bargaining and constructive dialogue.

## Forced Labour

Partners must not engage in any form of forced labour, including bonded labour, involuntary prison labour, or any other form of coercion.

They must comply with the UK Modern Slavery Act 2015 and actively work to prevent modern slavery and human trafficking within their own operations and supply chains.

## Child Labour

Under no circumstances may individuals be employed before completing compulsory education or in violation of applicable local laws regarding minimum working age.

The minimum age for employment shall not be lower than 15 years or the minimum age specified by applicable local laws—whichever is higher.

Young workers aged 15 to 18 may be employed, provided the work complies with local laws and does not interfere with their education, health, or well-being.

## Working Hours and Wages

Wages and compensation for a standard workweek must comply with applicable national legislation.

Partners must ensure that both regular and overtime working hours are in accordance with local legal requirements.

All employees must be granted at least one full day of rest every seven days.

## Discrimination

Partners must treat all employees fairly, with respect and dignity. They must uphold internationally recognised human rights and refrain from causing, facilitating, or contributing to any violation or abuse of workers' rights or human rights.

Any form of physical or mental harassment or abuse — whether verbal or non-verbal — is strictly prohibited. This includes harsh or inhumane treatment, coercion, isolation, or unwanted sexual advances. Threats of such treatment are equally unacceptable. Public shaming and disciplinary systems are strictly forbidden.

Partners must actively seek to prevent both direct and indirect discrimination in employment and must follow the principles of equal opportunity and equal treatment in all employment-related decisions.

Discrimination based on race, colour, sex, religion, sexual orientation, political opinion, ancestry, social origin, age, disability, HIV/AIDS status, or trade union membership is strictly prohibited — unless required by law or justified by the inherent requirements of the role in accordance with government-approved equality measures.

Partners must maintain a policy that includes a commitment to anti-discrimination or, alternatively, agree to adhere to Ardor's applicable anti-discrimination policy as amended from time to time.



### Health and Safety

Partners shall ensure safe and healthy working conditions and take appropriate measures to protect workers from occupational risks and foreseeable workplace hazards.

They must comply with all applicable standards concerning fire safety, occupational hygiene, lighting, ventilation, personal protective equipment, and access to safe drinking water.

All safety risks related to production or other machinery must be assessed. Where machinery poses a risk of injury, physical guards, interlocks, and safety barriers must be installed and properly maintained.

Partners must establish a system that enables workers to report health and safety incidents and near misses. Procedures must be in place for investigating, monitoring, and managing such reports.

Corrective actions must be taken to mitigate risks, ensure proper medical treatment, and support employees' safe return to work. If accommodation is provided, it must be clean, safe, and fulfil the basic needs of workers.

“The minimum age for employment shall not be lower than 15 years, or lower than the minimum age specified by applicable local laws.





# Business Integrity

## Anti-bribery and Anti-corruption

In line with Ardor's anti-bribery and anti-corruption policy, partners must not offer, promise, or provide any form of bribe, favour, cash, gratuity, hospitality, or anything of value to any Ardor employee in order to gain preferential treatment.

Likewise, Ardor employees are prohibited from soliciting such favours from partners. This restriction applies to all Ardor employees, their immediate family members, or any other individual with whom the employee has a significant personal relationship, in exchange for obtaining or maintaining business with Ardor.

Partners must uphold the highest standards of integrity in all global business dealings. All forms of corruption — including bribery, extortion, and embezzlement — are strictly prohibited.



Ardor defines bribery or kickbacks as follows: "The giving or offering of anything of value, either directly or indirectly, to a government official or an employee of a commercial entity, to secure or retain business, gain a business advantage, or influence a decision concerning Ardor. This includes, but is not limited to, obtaining licences or regulatory approvals, preventing adverse governmental action, reducing tax liabilities, avoiding customs duties, or obstructing a competitor's ability to bid."

## Fair Business and Competition

Partners must comply with all applicable antitrust and competition laws.

They must not enter into any financial or other relationship with Ardor employees that could give rise to an actual, potential, or perceived conflict of interest for Ardor.

Any such conflicts must be promptly disclosed and appropriately addressed. Even the appearance of a conflict of interest can be detrimental to both Ardor and the partner, and must therefore be disclosed in advance to Ardor management and approved accordingly.

Suspected corruption or conflicts of interest should be reported through Ardor's whistleblowing channel at [ardor.fi](https://ardor.fi)

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## BUSINESS INTEGRITY



### **Conflict minerals**

Ardor complies with the regulations of the U.S. Securities and Exchange Commission (SEC) and other conflict-free initiatives in response to customer requirements. The company is committed to maintaining a conflict-free supply chain.

Ardor conducts due diligence on its supply chain to reasonably ensure that minerals used in its products do not originate from conflict-affected areas, particularly the Democratic Republic of the Congo and its adjoining regions. For more information, please refer to Ardor's website.

Partners must inform Ardor if any products supplied contain tin, tantalum, tungsten, and/or gold.

Upon request, partners are required to provide Ardor with a completed Conflict Minerals Reporting Template (CMRT).

### **Confidentiality and Intellectual property**

Partners shall not disclose Ardor's intellectual property, know-how, confidential information, or documentation without prior written consent from an authorised representative of Ardor.

If a partner becomes aware of material, non-public information regarding any company — including Ardor's customers, partners, suppliers, or other business associates — through their relationship with Ardor, they must not trade in the securities of that company or otherwise benefit from the information. Disclosure of such information to third parties is also prohibited.

If a confidentiality agreement has not yet been signed with Ardor, the partner must immediately contact their designated procurement or contracting representative.

### **Employee data management**

Employee data must be recorded, stored, and used confidentially and in accordance with applicable local legislation.

“ Partners must uphold the highest standards of integrity in all business dealings globally. All forms of corruption, including bribery, extortion, and embezzlement, are strictly prohibited.

# Transparency

## **Governance and compliance**

Partners must establish an internal management structure to oversee compliance with Ardor Code of Conduct for Partners. This includes appointing suitably qualified personnel responsible for relevant areas, implementing appropriate policies and procedures, and maintaining accurate records and documentation of all related activities.

## **Audits and corrective measures**

To verify compliance with Ardor Code of Conduct for Partners, partners must maintain records of all relevant documentation and provide supporting evidence upon request.

Ardor reserves the right to audit and inspect the partner's operations and facilities, either directly or through a third party, with reasonable prior notice.

If a partner fails to comply with Ardor Code of Conduct for Partners, corrective measures must be implemented within a reasonable timeframe. Failure to do so may lead to suspension or termination of the business relationship with Ardor.

## **Reporting and disclosure**

Partners must accurately record and report information relating to business practices, labour, health and safety, and environmental matters. Falsification or misrepresentation is strictly prohibited.

## **Communication**

Partners must ensure that the Ardor Code of Conduct for Partners, or an equivalent standard, are communicated clearly to all employees.

It is recommended that a statement approved by management — affirming the partner's commitment to these principles and to continuous improvement — be displayed at the partner's premises (where applicable), in the local language.

## **Subcontractors**

Partners are responsible for ensuring that all subcontractors comply with Ardor Code of Conduct for Partners.

Subcontractors may not be engaged in the manufacture of Ardor products or components without prior written consent from Ardor.



# Whistleblowing

Partners must promptly report to Ardor any known or suspected misconduct, or any observed violations of the law or of the Ardor Code of Conduct for Partners, relating to their business with Ardor. This includes any known or suspected misconduct by Ardor employees or representatives.

**Partners must ensure that all employees have:**

- The right to report concerns regarding compliance with legal requirements, company policies, practices, or rules to their employer without fear of retaliation.
- Access to a system through which grievances can be reported, promoting open communication between management and employees.

**Ardor encourages its partners to:**

- Use either their own anonymous whistleblowing channel or Ardor's whistleblowing channel (website) to report workplace concerns.
- Protect whistleblower anonymity and strictly prohibit any form of retaliation.
- Report any activities related to corruption and/or conflicts of interest via the whistleblowing channel available on our website: [ardor.fi](https://ardor.fi)

Report any suspected corruption or conflicts of interest through Ardor's whistleblowing channel at [ardor.fi](https://ardor.fi)

# ARDOR

**Headroom in piping**



**Ardor is a pioneer in industrial piping prefabrication.**

We deliver unmatched reliability in industrial piping through advanced, digitally controlled prefabrication. With deep expertise in process industries, petrochemicals and shipbuilding, we boost our customers' productivity and competitiveness — sustainably.

**Read more at [ardor.fi](https://ardor.fi)**