



Supplier CODE OF CONDUCT

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PURPOSE AND SCOPE

At Meyer Turku (“MT”), we believe our long-term success depends on ethical and sustainable business practices throughout our value chain. This includes treating people and the environment with respect and acting responsibly in everything we do. Our business partners shall comply with the principles and requirements set out in this Supplier Code of Conduct (the “Code”). Compliance with this Code constitutes a material contractual obligation for all Suppliers. Breach of this Code may result in corrective actions, suspension or termination of the business relationship.

This Code outlines the minimum standards required from all Suppliers working with MT. It applies to all tiers of the supply chain and covers environmental, social, and governance (ESG) topics in line with applicable laws and international frameworks, including the EU Corporate Sustainability Reporting Directive (CSRD). It is grounded in internationally recognised standards for responsible business conduct, including the UN Global Compact, ILO Core Conventions, UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

We expect our contractors, labour providers and business partners to comply with this Code and ensure that its principles and requirements are applied throughout their own supply chains.



KEY REQUIREMENTS FOR OUR PARTNER NETWORK

Our suppliers shall uphold responsible, ethical and sustainable business practices in their operations and throughout their relationship with Meyer Turku. This includes, but is not limited to:

- Complying with all applicable laws, regulations and the requirements of this Code.
- Maintaining documented evidence (e.g. policies, procedures, records, certifications) demonstrating compliance with this Code and providing such evidence to Meyer Turku within a reasonable timeframe upon request.
- Establishing and maintaining their own Code of Conduct or equivalent policies, communicating them effectively to employees and applying the same standards across their own value chain, including subcontractors and sub-suppliers.
- Conducting sustainability due diligence and risk assessments that are appropriate to their business, operating context and exposure to sustainability-related risks.
- Ensuring that all subcontractors and sub-suppliers comply with the requirements of this Code, including by contractually imposing equivalent obligations. Suppliers remain responsible for the compliance of their subcontractors.
- Maintaining accessible and effective whistleblowing or grievance channels that allow employees and external parties to report concerns or suspected misconduct and ensuring protection against retaliation for anyone who raises a concern in good faith.
- Addressing deficiencies and non-compliance with the requirements introduced in this Code without delay and implementing corrective actions within agreed timelines.





HEALTH, SAFETY AND WELLBEING

Meyer Turku considers safety a top priority and is committed to a safe and healthy working environment.

Suppliers shall:

- Comply with occupational health and safety legislation and relevant authority guidance.
- Implement safety management practices and continuously improve safety performance.
- Conduct regular risk assessments and manage significant risks systematically.
- Ensure effective induction, training, supervision and on-the-job guidance for all workers, including subcontracted and temporary labour.
- Ensure the availability and proper use of personal protective equipment (“PPE”) and other safety measures. PPE shall be provided to employees free of charge.
- Comply with the applicable safety rules, standards, and instructions at the shipyard.
- Report safety hazards, incidents, and deviations related to work performed for us without delay.
- Cooperate with authorities and participate in inspections as required.





HUMAN RIGHTS AND FAIR WORKING CONDITIONS

Meyer Turku is committed to respecting human rights throughout our value chain, in line with the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

Suppliers shall:

- Identify, assess and mitigate human rights risks and adverse impacts within their operations and supply chains.
- Prohibit forced labour, human trafficking, child labour and all forms of modern slavery.
- Ensure all work is voluntary and employment relationships are lawful. Suppliers must comply with these requirements even where workers themselves request arrangements that would violate legal limits (e.g. excessive working hours or insufficient rest).
- Pay wages correctly and on time, ensure equal pay for equal work, and comply with working time and rest period regulations. Suppliers shall strive to ensure that wages meet basic needs and support a decent standard of living.
- Not tolerate discrimination, harassment and inappropriate treatment, and address such cases promptly.
- Respect employees' rights to freedom of association, collective bargaining, and peaceful assembly.
- Apply ethical recruitment practices and not charge recruitment fees to workers directly or through intermediaries.
- Ensure any accommodation provided or arranged meets health and safety requirements.
- Retain verifiable records of employment terms (e.g. contracts, payslips and working time records) and provide them upon request. This includes ensuring that workers understand the terms of their employment and are supported in exercising their rights, even where they are unable to advocate for themselves.
- Monitor subcontractors and sub-suppliers and promptly address any non-compliance. Responsibility for compliance cannot be transferred to other parties in the chain.
- Provide information on identified human rights risks and adverse impacts upon request.



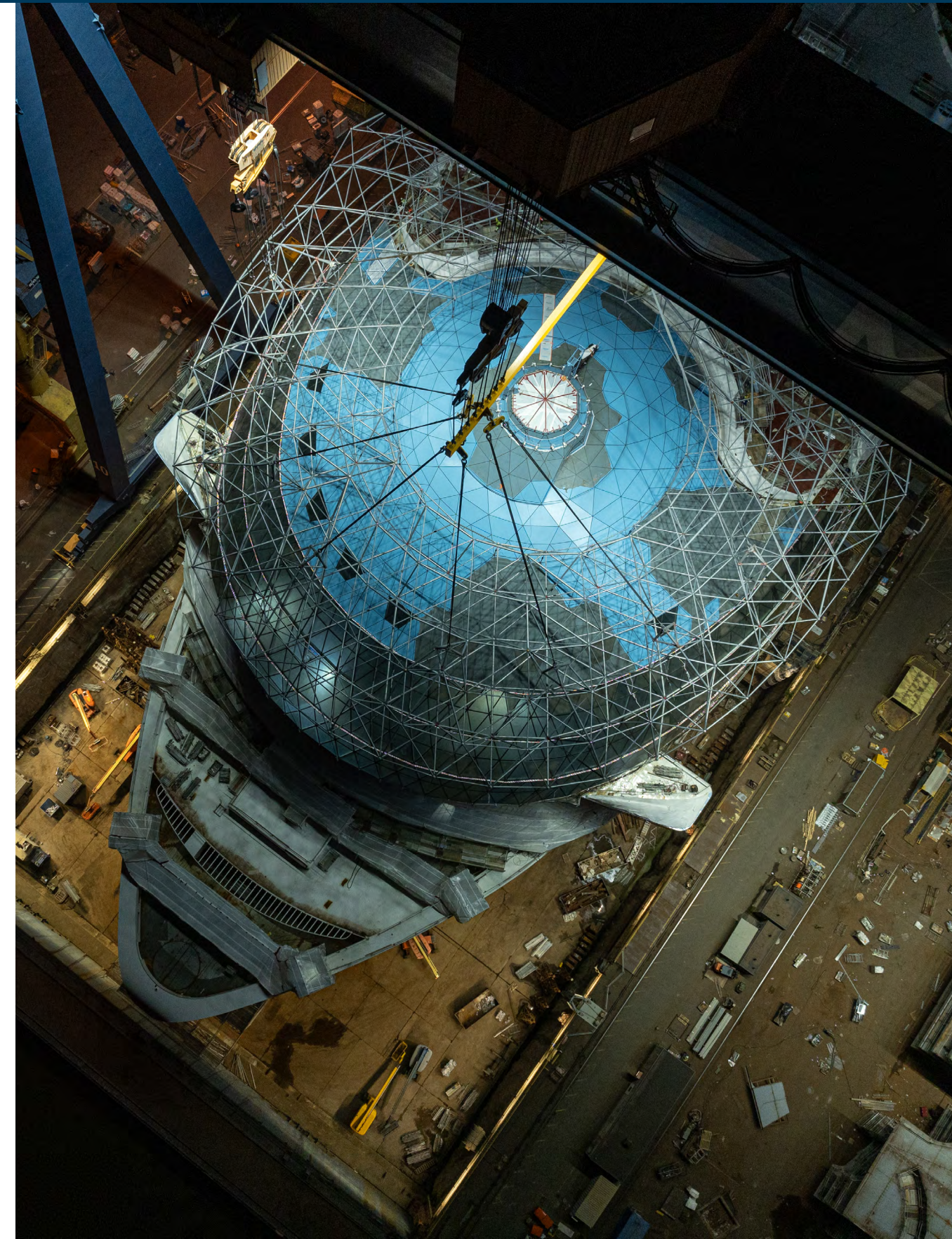


ENVIRONMENTAL RESPONSIBILITY

Meyer Turku is committed to minimizing environmental impacts and promoting energy efficiency and circular economy.

Suppliers shall:

- Identify, manage and reduce environmental impacts, such as emissions, waste and other adverse environmental impacts, to comply with applicable environmental legislation and requirements. All required permits, licences and registrations shall be obtained and reporting requirements followed.
- Handle chemicals and hazardous substances responsibly (storage, labelling, use, transport and disposal).
- Ensure proper waste segregation, recycling and safe waste management, and prevent environmental damage (e.g. spills).
- Ensure traceability of materials and chemicals where applicable.
- Ensure responsible sourcing and use of minerals and avoid the use of conflict minerals.
- Provide sustainability and product-related information upon request (e.g. material content or origin data).
- Ensure that their workers act in an environmentally conscious manner.





ETHICAL BUSINESS CONDUCT, ANTI-CORRUPTION AND FAIR COMPETITION

Meyer Turku is committed to ethical, transparent and lawful business conduct and has zero tolerance for corruption and anti-competitive behaviour.

Suppliers shall:

- Maintain zero tolerance for bribery and corruption.
- Not offer, promise or provide anything of value to government officials, political parties, candidates for public office or any other comparable person.
- Not make facilitation payments to speed up or secure routine government actions, even if local law permits them.
- Ensure gifts and hospitality in business relationships are reasonable, lawful and do not affect decision-making.
- Identify and promptly disclose actual or potential conflicts of interest.
- Comply with competition and antitrust laws.
- Keep accurate and transparent business and financial records and prevent misconduct.
- Maintain accurate and up-to-date documentation on ownership structures and related KYC information, ensure such information is readily available upon request, and inform promptly of any updates or changes.
- Carry out appropriate due diligence on third parties, such as agents, consultants and intermediaries.
- Comply with applicable sanctions and trade control requirements.





DATA PROTECTION AND CONFIDENTIALITY

Meyer Turku is committed to protecting confidential information and personal data at all times and handling it in compliance with applicable laws.

Suppliers shall:

- Comply with applicable data protection and cybersecurity laws and regulations.
- Maintain appropriate information security and data protection controls.
- Ensure adequate technical and organisational cybersecurity measures are in place to manage cyber risks.
- Protect confidential information, trade secrets and intellectual property.
- Restrict access to information for those with a legitimate need to know.
- Ensure information is stored, transferred and disposed of securely.
- Notify Meyer Turku without delay of any data breach, cyber incident or suspected unauthorised access affecting Meyer Turku.
- Ensure that the use of artificial intelligence or automated decision-making systems complies with applicable laws, data protection requirements and ethical standards, and does not create unacceptable risks to safety, data protection or fundamental rights.





REPORTING CONCERNS AND NON-COMPLIANCE

Meyer Turku is committed to promoting a culture of openness and accountability.

Suppliers shall:

- Promote an open culture in which employees feel safe to raise questions or concerns without fear of retaliation.
- Maintain accessible reporting or grievance channels for employees and other stakeholders and ensure that these are effectively communicated
- Ensure protection against retaliation for good-faith reporting and prohibit any form of retaliation against individuals who speak up in good faith.
- Investigate potential misconduct appropriately and take appropriate action based on the outcome of investigations.
- Inform Meyer Turku without delay of any concerns, incidents or irregularities that involve Meyer Turku, its employees, assets or operations.
- Prepare corrective action plans where necessary and monitor implementation.



ENSURING COMPLIANCE WITH THIS CODE

Meyer Turku has the right to verify supplier compliance with this Code through inspections, assessments and audits. These may include self-assessments, on-site evaluations or reviews carried out by Meyer Turku representatives or approved third-party experts. Audits will be conducted with reasonable notice and with the supplier's consent. Suppliers shall not unreasonably withhold consent for audits.

Suppliers shall:

- Participate in dialogue, self-assessments, on-site evaluations and other compliance reviews related to this Code.
- Cooperate with Meyer Turku representatives and approved third-party experts during audits and assessments.
- Not unreasonably withhold consent for audits and provide reasonable access where needed to verify compliance.
- Provide accurate, complete and timely information and documentation upon request, and not instruct or influence employees to give misleading or inaccurate information.
- Take necessary corrective actions without delay and within agreed timeframes if an assessment or audit identifies non-compliance or deficiencies.

Failure to implement effective corrective actions, or serious or repeated breaches of this Code, will result in corrective measures, suspension or termination of the contractual relationship.





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