

## Steripolar Oy, Ethical and Responsible Operating Principles

### CEO's Foreword

Responsibility and ethical conduct are the foundation of Steripolar Oy's business. In the field of health technology, trust and preservation of trust require consistent commitment to our ethical and responsible principles.

This guideline defines our principles and procedures to ensure responsibility and ethical business conduct. Every Steripolar employee is expected to act in **accordance** with these principles and promote fair, transparent, and sustainable business.

This guideline applies to our company's board, CEO, and all Steripolar personnel. Each of us has the duty and responsibility to know the contents of this guideline and commit to its compliance. I thank every employee and partner for their commitment to these shared values. Together, we can ensure that our **Taking care further** value promise is realized in practice.

*Kaj Dahlström*  
CEO

### Steripolar Oy

We are a provider of innovative health technology solutions and have served both public and private healthcare since 1985. We offer high-quality and innovative products as well as new treatment methods that promote patient safety and accelerate recovery.

Our daily work is guided by our **Taking care further** value promise. It is important to us that no one in the chain of health promotion is left alone—not professionals, customers, nor decision-makers. For each of them, a Steripolar problem-solver is ready. We have a desire to help more than is necessary. We view the world from a perspective where people come first, and therefore responsible and ethical conduct is of utmost importance to us.

Our strategic goal is to ensure the sustainable impact of our business, combining economic and social responsibility, environmental consideration, and the long-term development of healthcare. We believe that sustainable and responsible solutions create added value for our customers, stakeholders, and society.

## Our Employees

**The foundation of our success is a skilled and well-being staff.** Our goal is to promote a safe and healthy work environment where every employee can focus on their work and professional development. Health and safety, equality and non-discrimination, and the continuous development of the work community are central to our broader social responsibility.

Our operating principles include equal treatment and the promotion of equality and non-discrimination in all areas of operation. We monitor employee experience, for example, through regular staff surveys.

We invest heavily in skills development, as we believe it is a key factor in our employees' professional growth and our company's success. We offer diverse training and development opportunities that support individual career development and the growth of the entire company. We encourage our employees to take an active role in self-development and provide support and mentoring for this. Through these actions, we ensure that everyone has the opportunity to grow in their work and develop their expertise in a changing environment.

## Ethical and Responsible Conduct

As a member company of Sailab Medtech Finland ry and Swedish Medtech, we are committed to following our industry association's code of ethics. By committing to these guidelines, we ensure fair competition and responsible business in the healthcare technology sector.

We do not tolerate fraud, corruption, bribery, or unauthorized anti-competitive practices in our operations or supply chain. We are committed to supporting both international and local efforts to combat bribery, corruption, and financial crime. It is of utmost importance to us to protect both our own and our stakeholders' confidential business information. To ensure this, we are committed to the following principles:

- **Principle of Carefulness:** All our employees are obliged to handle company and partner information carefully, and only those who need the information for their work may process it.
- **Principle of Confidentiality:** We do not share or misuse competitively sensitive information, such as pricing, contract negotiations, or product development information.
- **Principle of Ensuring Competence:** Our employees and stakeholders have clear instructions for responsible conduct and compliance with industry ethical guidelines, including event organization, hospitality, and gifts.
- **Principle of Transparency:** We keep our operations transparent and do not make decisions based on personal interests or inappropriate relationships.

We are committed to complying with competition law in all our activities. Our principles of fair competition include:

- **Prohibition of Cartels and Illegal Market Coordination:** We do not participate in illegal price agreements, market sharing, or other anti-competitive practices.
- **Prohibition of Sharing Competitively Sensitive Information:** We do not exchange information with competitors that could distort market operations, including pricing, sales strategies, bids, or customer choices.
- **Prohibition of Violating Competition Law Guidelines:** We comply with competition law guidelines in public procurement and avoid actions that could lead to conflicts of interest or unfair competitive advantage.

Our employees receive regular training on competition law principles and are instructed to identify and report any possible violations or ambiguities. This ensures our operations remain compliant with competition law and protects our company from legal risks.

## Human Rights

We are committed to fulfilling minimum responsibility obligations and respecting human rights in all our activities. We require the same commitment from our supply chain and partners. We strive to prevent adverse impacts on human rights and address them promptly. This ensures ethical and socially responsible business.

We comply with environmental and labor legislation and, where applicable, the collective agreement for the trade sector. We are committed to the principles of the UN Global Compact and the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the International Labour Organization (ILO) conventions. In our business, this means:

- We recognize and support children's rights in our business and society. We do not accept child labor or any other form of child exploitation in our operations or supply chain.
- We do not accept forced labor, slavery, illegal workers, or other forms of worker exploitation.
- We promote equal rights and opportunities for our employees at the workplace, regardless of gender identity, age, ethnicity, religion or beliefs, disability, sexual orientation, etc.
- We recognize our employees' freedom to join or not join a workers' association of their choice and to negotiate collectively or individually in accordance with local laws and regulations.

- Human rights obligations are part of our core processes, and we take action to prevent or remedy harmful actions when we identify possible or actual negative impacts.
- We continuously develop our understanding and competence.

## Well-being in Harmony with Nature

We are committed to environmentally responsible and sustainable development in all our business activities. Our operations are certified according to the **ISO 14001 environmental standard**, and we promote the objectives of our environmental policy in the long term. We focus especially on reducing the environmental impact of transportation and waste, as these are the most significant areas of our environmental footprint. We are also committed to:

- **Monitoring and reducing our carbon footprint** and developing our operations through carbon footprint calculation.
- **Producer responsibility for packaging materials** by being a member of the Packaging Sector Environmental Register Rinki Oy.
- **Recycling responsibility for electrical and electronic equipment** by being part of the healthcare equipment recycling system (SELT).

Environmental responsibility is an important criterion in our supplier selection. We cooperate with partners who consider environmental aspects in their production and material choices and who promote and demonstrate actions to reduce their environmental impact. We value and bring to market solutions that have a demonstrably positive impact on environmental load and the sustainability of end-user operations.

## Quality and Risk Management

Our business is based on high quality and continuous improvement. Our company is certified according to **ISO 9001 and ISO 13485 quality management systems**. The health technology solutions we represent meet legal requirements (e.g., MDR/IVDR). We comply with quality standard requirements and national guidelines (Fimea) in managing product deviations and recalls. This ensures effective and prompt responses to maintain patient safety and customer trust.

Our quality policy is based on risk and change management and continuous improvement of our operations. As part of fulfilling minimum responsibility obligations, we are committed to identifying, preventing, and correcting possible deficiencies and deviations in our operations and supply chain.

Regular risk assessments ensure the management of responsibility risks and prevention of risks so that adverse effects can be identified and eliminated promptly. Through risk assessment:

- **We identify and anticipate** risks affecting our operations.
- **We reduce possible adverse effects** for our customers and partners.
- **We develop preventive measures** to ensure the reliability of our operations and the fulfillment of minimum responsibility obligations in the future.

## Supply Chain Responsibility

Ensuring supply chain responsibility requires systematic and continuous monitoring. We evaluate all our suppliers and their fulfillment of minimum responsibility obligations before establishing a supplier relationship. In addition, we require suppliers to commit to Steripolar's ethical principles and responsibility commitment. The fulfillment of responsibility obligations is monitored regularly throughout the supplier cooperation.

We use a self-monitoring questionnaire to ensure responsibility, which our suppliers use to report on their responsibility practices. To ensure supply chain transparency, our suppliers can demonstrate the origin of products and materials, for example, through digital systems.

We classify suppliers based on responsibility risks, and for those operating in risk countries or using critical materials, we set stricter requirements. If industrial production takes place in a risk country or critical materials are used, suppliers must demonstrate compliance with minimum responsibility requirements, for example, with SA8000 certification or third-party audits (e.g., Amfori BSCI and Sedex SMETA). We may also conduct our own audits of production facilities or different operations to ensure compliance with responsibility requirements.

If deficiencies in responsibility are detected, we primarily offer the supplier the opportunity to correct them within an agreed schedule. If necessary, we work closely with the supplier to correct possible deficiencies. We also continuously develop supplier cooperation and provide training on responsibility practices as needed. If deficiencies are not corrected, we assess the conditions for continuing the contractual relationship.

## Information Management

We respect privacy and understand the importance of protecting personal data. We are committed to protecting the data of our customers, partners, and employees and complying with applicable data protection legislation (EU General Data Protection Regulation, GDPR). All processing of personal and confidential data is based on an appropriate legal basis, and data is protected by technical and organizational measures against unauthorized access, alteration, and misuse. We handle all confidential

information with at least the same care as our own confidential information and require the same from our partners.

It is of utmost importance to us to act as a reliable and security-conscious organization. Through information security, we build and maintain the trust of our customers and partners. We are committed to fulfilling the obligations of the NIS2 directive as part of the NIS2-related supply chain. We also ensure, through regular training, that our staff is capable of recognizing and acting vigilantly against cyberattacks and other digital threats to ensure the company's information security.

### **Procedures for Correcting Deficiencies**

Addressing detected deficiencies and responsibility deviations is a key part of our operations. All deviations related to responsibility must be reported immediately to the person responsible for the company's responsibility, after which they are recorded and assessed based on their severity. In significant cases, we immediately initiate corrective actions to minimize harmful effects.

Corrective and preventive actions are taken as required by the situation. This may mean updating processes and practices to meet responsibility requirements, training staff and stakeholders on responsibility practices, or supporting suppliers in meeting requirements. If responsibility deficiencies are not corrected as agreed, we may assess the conditions for continuing the contractual relationship and, if necessary, terminate cooperation with a party that violates responsibility requirements.

We continuously monitor the effectiveness of corrective actions and develop our responsibility practices as needed. We report openly to our stakeholders on significant deviations and their correction. This ensures that our operations support sustainable development and ethical business practices. We also strengthen our responsibility expertise through continuous training and guidance to ensure effective and consistent identification and management of deviations.

### **Transparency and Ethical Reporting**

We operate openly and promote transparent interaction with both our staff and stakeholders. We encourage everyone to report observed unethical practices, misconduct, or violations of responsibility requirements. We have an external, EU Whistleblower Directive-compliant reporting channel through which reports can be made safely and confidentially.

All reports are handled anonymously, carefully, impartially, and promptly. The anonymity and data protection of reporters are ensured, and they are protected from possible retaliation. We report significant detected deficiencies and their correction appropriately to our stakeholders and authorities, ensuring transparency and responsibility.

## Closing Words

Compliance with ethical and responsible operating principles is a key part of the operations of both Steripolar and our stakeholders. We regularly review our guidelines and ensure the awareness of our employees and partners through continuous communication and training. Management and supervisors act as examples of ethical conduct and support staff in implementing responsible practices in practice.

We systematically monitor and evaluate our responsibility practices to ensure their timeliness, effectiveness, and efficiency. Ethical and responsible conduct is part of every Steripolar employee's daily work. By committing to these principles, we ensure sustainable, transparent, and reliable business and build long-term cooperation with all our stakeholders.

*Espoo, 25 June 2025*

*Steripolar Oy Board*