

# Code of Conduct, Demeca Oy (EN)

## Demeca`s commitment to sustainability

We believe that sustainability is one of the essential success factors in Demeca`s business. Our business is based on effectiveness and our values, and we are waiting similar commitment from our partners and employees. Being responsible means openness, honesty, and reliability towards our partners. We care about our customers, workers, investors, partners and society, and we aim to reduce Demeca`s impacts on the environment.

Demeca`s everyday work is guided by this document called Code of Conduct (Demeca Code), which means the ethical principles of work. This Demeca Code supports us in making right decisions and managing international business in a right way. Every people in Demeca have an obligation to ourselves and to our partners to act according to the Demeca Code. We believe that as a company and as a worker the responsible growth is the only way to achieve our long-term goals.

Pekka Vinkki

CEO, Demeca Oy

# 1 How we manage sustainability

Our sustainable acting is based on our vision, mission, and values. These are presented in our Concept book which is the quality system book of Demeca. The concept book is created according to the principles of the standards ISO 9001: 2015 and ISO 14001: 2015 and our long-term goal is also to apply for the related certifications in a suitable moment. Demeca Code is built on the Responsible Business Alliance (RBA) code of conduct model. This model includes Management, Health and safety, Quality, Labour/people, Environment and Ethics of business.

## 2 Quality practices

### **2.1 Custom oriented approach**

Demeca`s strength is that we know the main customer groups – which is farms and consortiums to which farms and other actors are providing raw materials - very well and we are living together the challenges of the farmers. Demeca has a good reputation of its well-functioning biogas plants and of repairing the plants - in cases there exist some failures - according to the contracts with customers. We are committed to continuously develop quality, business, processes, and productiveness which lead to better customer satisfaction.

### **2.2 Responsibility and people**

Demeca is a profitable investment to its investors. We are fostering sustainable development and taking care of wellness of our workers, as well as their safety and their possibilities to develop themselves further. Every worker has responsibility of quality of his/her work. We offer an open and inspiring atmosphere which encourages people to learn more and to utilize their skills.

### **2.3 Productivity and the future**

We are currently verifying our performance with our goals. Our decisions are based on the strategy and on the analysing of our activities. We are committed to continuous development, and we are seeking for new best practices.

## 3 Environmental sustainability

Demeca has recognised that we must minimize the environmental impacts of our activities. In the environmental sustainability topic, we have hired a specialist who has created a dedicated chapter of the

environmental sustainability to the concept book. In a nutshell the environmental sustainability includes the following aspects:

- Continuous evaluation of the environmental impacts of the processes and of the facilities
- Continuous development of the processes and products, from the environment`s point of view
  - Good methods for design and production
  - Developing resource efficiency of manufacturing
  - Minimizing the usage of dangerous raw materials
  - Minimizing the waste, and re-using and circulating materials
- Acting in compliance with laws, statutes, and Demeca`s concepts, and - when needed – creating new concepts and describing those in the concept book
- Increasing awareness, special skills and knowledge due further education and consultation
- Open communication regarding environmental issues of our products and activities

## 4 Ethics of Business

### 4.1 No improper advantage

We comply with the RBA Code of Conduct 8.0, point D ETHICS and its sub-point 2 No Improper Advantage. Demeca has zero-tolerance against corruption. In this topic we act according to the following points:

- The concept book guides to the workers the rules, which will be followed when customers and partners are served (food, coffee, and the price levels)
  - New workers will be informed of these rules and current workers will be reminded in the week opening meetings twice a year
- With business gifts the rules of tax officials will be followed, either when offering gifts or receiving gifts and the link of the guide of the tax officials will be added into the concept book (the Finnish link: <https://www.vero.fi/syventavat-vero-ohjeet/ohje-hakusivu/48743/edustusmenot-tuloverotuksessa2/> ***Mainoslahjat ja edustuslahjat*** )
- Before a transaction happens, it is now allowed to give any gifts to customers
- The system guides, that no business gifts shall be received from suppliers in relation to a buying or a contract, when negotiations are going on
  - Otherwise, the rules of the tax officials will be followed also in this case

### 4.2 Dissemination of information

All information dissemination activities will be done openly and based on accurate data. The business result will be processed in compliance with the Demeca`s practices and the law of enterprise practices of Finland (“Osakeyhtiölaki” in Finnish).

### 4.3 Confidentiality

All workers shall process confidentially the data, which they have got during working in Demeca, which are related to the workers, customers or suppliers, and to the businesses of these beforementioned actors. This confidentiality is valid during the working period in Demeca, and also after that working period.

#### **4.4 IPR-rights**

All workers shall keep as confidential all the IPR data of the following actors: Demeca , customers, suppliers, and investors.

#### **4.5 Fair competition and advertisement**

Demeca`s activities will comply with the law of business competition, and we will comply with the rights of fair competition, thus following the laws and statutes, and we are requiring this also from our partners. Our workers shall not discuss, verify, inform, or in any way agree with competitors of prices. Also, they shall not agree with any conditions of the transactions with the competitors in relation to the business.

#### **4.6 Responsible sourcing of minerals**

We comply with The EU Conflict Minerals Regulation and we expect our suppliers to comply with our policy.

#### **4.7 Privacy**

We are committed to following the existing laws regarding personal data protection. We ensure that our workers and partners are aware of the purpose of this policy, reasons of these practices, and also aware of their rights of their personal data.

## **5 People**

Demeca ensures that workers have good working conditions and takes care of the human resource policy so that workers have a possibility to reach their full capacity.

#### **5.1 Free chosen employment**

Our workers shall not be subject to any forced or compulsory labor. They must have a freedom to end their employment at any time without penalty: in these practices Demeca will comply with the related local laws and statutes.

#### **5.2 Young workers**

Demeca makes sure that any workers under the minimum age defined by ILO will not be hired (the minimum age is the age when compulsory education ends or at least 15 years), or 14 years in the countries where educational conditions are under-developed. The workers under 18 years shall not be hired to the tasks where appears danger or where their personal development is threatened, and their benefit must be primary.

#### **5.3 Working hours**

Demeca complies with applicable laws for working hours and free time.

#### **5.4 Wages and benefits**

Demeca ensures that workers have rights to reasonable wages and offers benefits which are related to working contract and which are increasing empowerment. Demeca offers also social safety.

## **5.5 Human treatment and non-discrimination**

Our activities are based on equality and our behaviour against each other is professional and fair. Our goal is to offer equal possibility and treatment in the employment relationship, and no-one shall be discriminated because of the basis of their gender, age, race, religion, or any other reason which could cause discrimination. All employees have rights to be treated with dignity, and there must be zero-tolerance against harassment and teasing in all its forms (indirect, direct, verbal, or psychological).

## **5.6 Freedom of association**

We appreciate the workers` and officials` rights to freely and voluntarily join – based on their own choice – to a trade union, in order to enhance and defend their professional interests, without being afraid of scaring or revenge. These practices will be implemented according to the national laws.

# **6 Occupational health, wellness and safety**

We recognize that good caring of occupational health, wellness and safety is a benefit both to worker and to employer. We also aim to detect risks to be hurt or risks for getting ill and we are implementing activities to avoid those risks. All our workers are getting knowledge and education of these topics so that we can ensure that implementation of these activities will be realized.

## **6.1 We organize healthy and safe working conditions**

In Demeca`s premises and constructing goals of the biogas plants we ensure that every worker and visitor are able to act in a healthy and safe way.

## **6.2 Occupational health and safety requirements**

We comply with the applicable laws and requirements for occupational health and safety.

## **6.3 Eliminating and minimizing risks**

Demeca takes care of eliminating and minimizing risks so that occupational health and safety will not become endangered.

## **6.4 An effective ensuring system for occupational health and safety**

Especially the foremen like also all workers, have responsibility to communicate openly of all potential risks in these topics. They can also use the anonym Whistleblower channel for this communication (it can be found in the Demeca`s web page in the point “Sustainability”). Demeca is also using professional consultants when needed, aiming to enhance working conditions of Demeca`s labour, like eating and sports activities. **Demeca is also using the “model early reaction” which has the purpose of getting working wellness developed again to good level when any signs of bad wellness have been detected.**