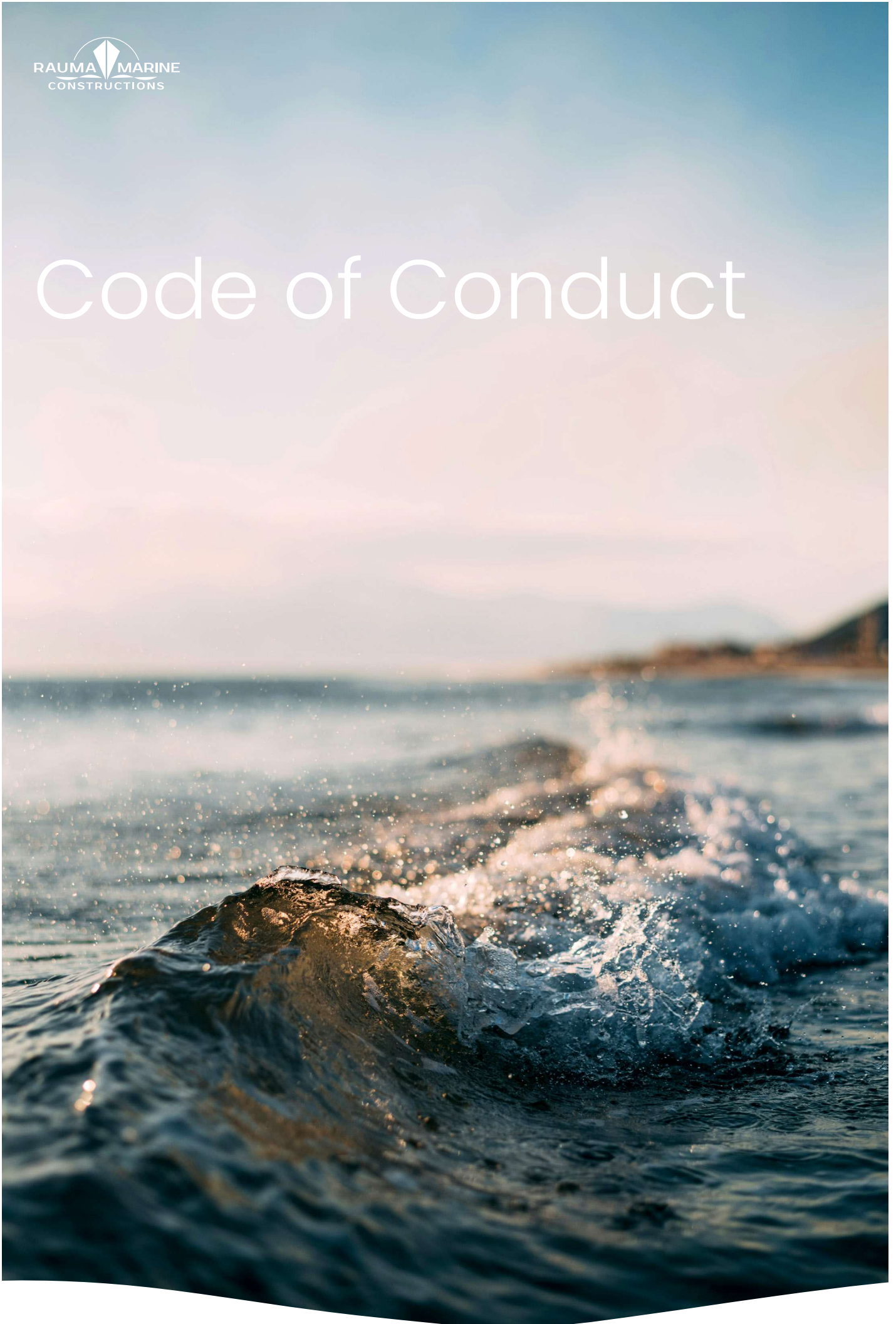


# Code of Conduct





# Message from CEO

Dear Colleagues,

Rauma Marine Constructions operates globally, and each of us represents RMC in everything we do. Our reputation as a responsible and trustworthy company is built on how we collaborate with our employees, customers, business partners, suppliers, authorities, and the people and communities affected by the vessels we build.

Our vision and values can only be achieved if we all understand our responsibility to act in line with the highest ethical standards. By doing so, we earn the trust of our markets and the communities where we operate, and we build a workplace we can be proud of. One of RMC's core values is Trust. It means being honest, reliable, and committed to keeping our promises. By following this Code of Conduct, we demonstrate through our actions what trust means at RMC.

RMC's Code of Conduct sets out the ethical standards of behavior expected from all employees and stakeholders. Our industry is highly regulated, and we carry a special responsibility to comply with all applicable laws, regulations, and international obligations. We must apply the highest ethical standards in everything we do—without exception.

The Code of Conduct supports decision-making, especially in situations where the right course of action may not be clear. It also reinforces our commitment to a safe, respectful, and inclusive working environment where everyone feels confident to speak up. Raising concerns and reporting misconduct are essential parts of responsible behavior, and all reports will be handled confidentially.

Our commitment to the Code of Conduct is non-negotiable. All violations are taken seriously and will have consequences. I want to emphasize my strong personal commitment to ethical business conduct and compliance, which are fundamental to RMC's long-term success.

Doing the right thing is good business. Each of us plays a vital role in upholding RMC's values and strengthening our company culture. By acting with integrity, accountability, and professionalism, we ensure that RMC remains a trusted partner and a safe and respected workplace.

Mika Nieminen  
CEO  
Rauma Marine Constructions Oy

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# Why RMC Code of Conduct?

RMC is a company acting in the international arena and we, as RMC employees, all carry with us the RMC brand in our daily operations. RMC's reputation as a responsible company is based on a set of principles regarding our behaviour towards employees, shareholders, customers, suppliers, authorities and all of the people living and working in solutions/environments (ships) constructed by RMC around the world.

Our vision and values can only be fulfilled if we all understand that we must represent the company in a way that meets high ethical standards. This way we will gain respect on the market and in the societies where we are active, and we will create a working environment that is attractive to us as employees.

One of RMC's core values is Trust. By that we mean that we are honest and reliable, and that we keep our promises. By following the standards and principles of this Code of Conduct, we will demonstrate in practice what this value means to the company and to us as employees.

## What is covered by the Code of Conduct?

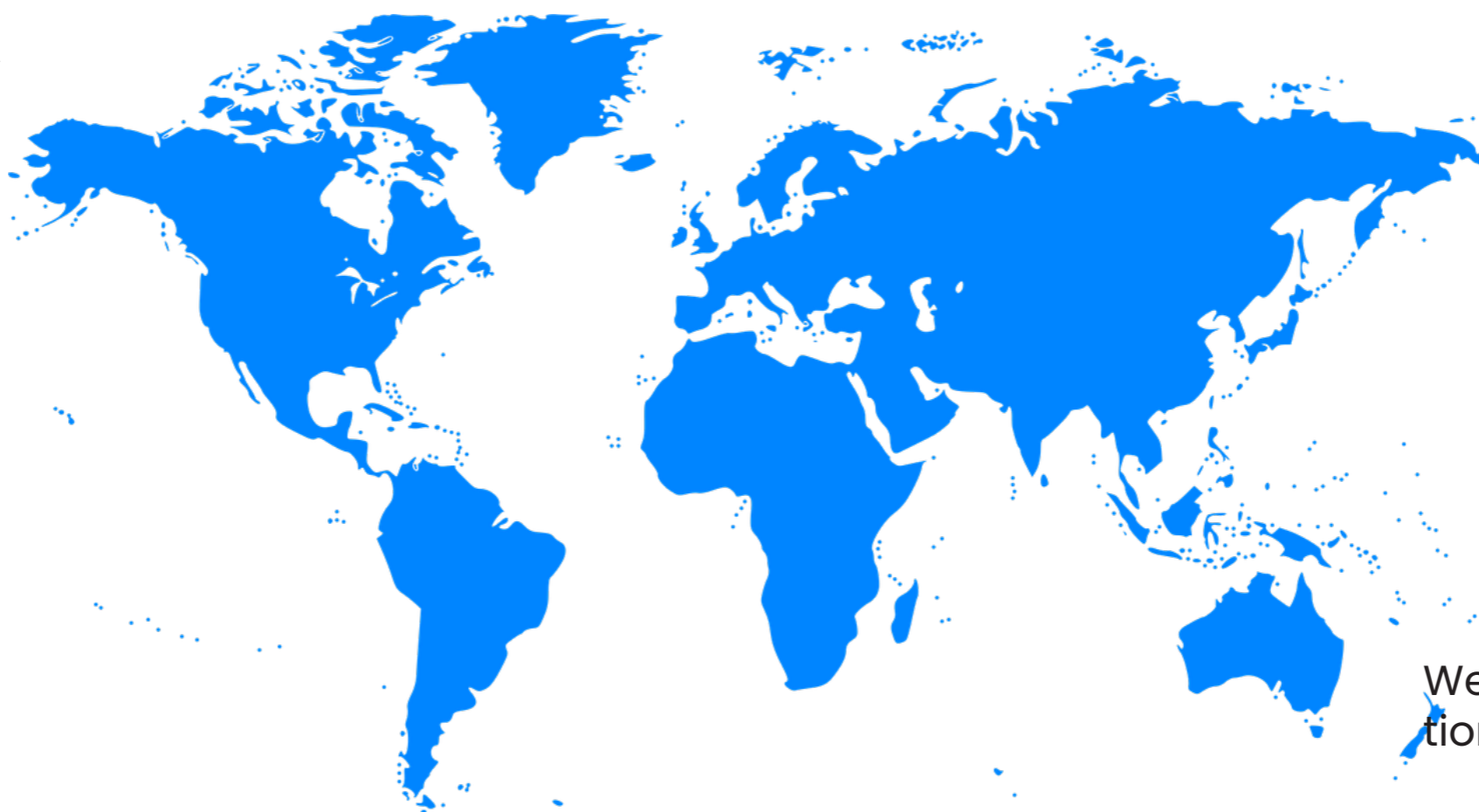
As a global marine technology and construction services RMC has an impact on many communities around the world. We strive to ensure that all our operations are carried out in a socially responsible and globally aligned manner.

## Main principles

We are committed to principles such as

- UN Global Compact and Sustainable Development Goals
- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD's Guidelines for Multinational Enterprises

Code of Conduct is a summary of the standards and principles of conduct expected from all employees and other stakeholders. It does not, however, cover all aspects of behaviour. There will always be areas where we need to use our judgment as individuals.



## Labour and Human Rights Commitment

We are explicitly committed to upholding the fundamental rights of all individuals in our operations and supply chain. This includes:

- Respecting freedom of association and the right to collective bargaining
- Ensuring no individual is subjected to forced labour, child labour, or any form of discrimination in respect of employment and occupation

These commitments are guided by international standards, including the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

# The Regulatory Framework

## We follow laws and regulations

RMC has operations in a number of jurisdictions and is represented in many more. We are responsible for understanding and following local laws and regulations in the countries where we are present or do business. In the event that these are less restrictive than our own standard, we shall always apply the RMC standard unless other instructions are given.

## We comply with arms and export control regimes

RMC, as a company operating in the defence and security areas, has specific responsibilities towards the Finnish Government and other governments. We are acting in a field of business that is highly regulated. In order for us to continue to operate as a world-class company, it is necessary that we conduct our business strictly in accordance with the required authorizations and licenses, and that we always, without exception, meet the conditions applicable to our business.

## Company commitments

The board of directors and management of the company and its employees must commit to these standards and principles. Acts in violation of the Code of Conduct may cause damage to the company's reputation and may lead to legal actions against the company and employees. They may also be a breach of the terms of employment, which are based on confidence and loyalty, and may lead to labour law actions.

## Seeking advice

We will inevitably be confronted with complex situations where we feel we do not get a clear answer from the Code of Conduct or through our Management System. When this is the case, we expect employees to discuss the matter with their nearest superior or to seek advice from our Legal Affairs.

# Zero tolerance against corruption

## We compete fairly and honestly

We are firm believers in free enterprise trade and in fair competition. This system is protected and promoted by competition law. We always conduct our business in compliance with antitrust laws and other laws that regulate competition.

## We work to prevent corruption and corruptive practices

RMC applies zero tolerance for corruption. This means that we must not under any circumstances be engaged in, encourage or tolerate bribery through payments or other benefits to public officials or private sector employees with the aim of obtaining or retaining business or any other advantage. We are aware of the risk that payments to market intermediaries may be used to improperly influence business decisions. We are committed to preventing this by implementing and adhering to requirements and procedures in our operations that are consistent with the best practice.

## We do not offer improper gifts or hospitality

Moderate and reasonable gifts and hospitality which are customary in business are normally acceptable if given for the right reason, i.e. demonstrating our products and services, improving the image of the company or establishing cordial business relations. We shall however be aware that even customary gifts and hospitality may be inappropriate in connection with forthcoming or ongoing business negotiations and we always pay attention to our customers' integrity policies.

We shall not offer gifts or hospitality of a value or nature or under circumstances that may be seen as an attempt to improperly influence business decisions or obtain other improper advantages. Openness, transparency and correct recording are key elements to demonstrate compliance with these requirements.

## We do not accept improper gifts or hospitality

As RMC employees we must always be, and be seen as, impartial and professional representants of our employer when dealing with others. This means that we shall only accept gifts and hospitality offered by others if they are reasonable in relation to the business in question and if they are within the boundaries of customary business behaviour. Gifts and hospitality of high value or of unusual or unethical nature shall not be accepted. If you are in any doubt if you as a RMC employee should accept a specific gift or participate in an event, you must seek advice from your superior or from our Legal Affairs.

## We avoid conflicts of interest

We shall always keep personal interests apart from company business. Decisions by or for the company must never be influenced by personal preferences or relationships. Issues of conflicting interest may arise from employing or otherwise engaging former public officials who have had a position with an authority where matters concerning RMC are dealt with. We must never do so without verifying that it does not violate any laws, regulations or directives. We shall always seek to mitigate the risk of conflicts of interest.

## We support efforts to develop standards that encourage ethical behavior

Our top-level guidance comes from UN Global Compact giving us the main principles for ethical behavior.

In addition to this RMC is the member of Finnish Defence and Aerospace Industries – PIA. It is the voice of the Finnish companies operating within defence, aerospace and security. Furthermore, PIA is the member of Aerospace and Defence Industries Association of Europe (ASD). PIA represents also the Finnish defence industry in NIAG (NATO Industrial Advisory Group), in European Defence Agency (EDA) and in Nordic Co-operation.



## Our Workplaces

### Our workplaces are safe

RMC shows commitment to health and safety and works to eliminate accidents, illnesses and injuries. We see it as our duty to protect each other's health and safety and to help each other to create a sound working environment. We do not tolerate any form of harassment, bullying or other offensive physical or verbal treatments. It is our common task to ensure that the working environment is safe, both physically and psychologically.

### Diversity is a basis for successful business

We firmly believe that workplaces characterized by diversity establish a solid foundation for greater creativity and innovation. We shall work actively to make RMC more diversified at all levels of the company because it is a basis for successful business.

### Discrimination is prohibited

Our decisions on hiring, promotion, development and compensation are based on the employees' abilities and skills related to the job and must never be based on irrelevant factors, such as gender, age, ethnic or national origin, religion, disability, sexual orientation, union membership or political affiliation. As employees we shall conduct our work with respect for all people regardless of differences.

### The right to form and act through trade unions is fundamental

We respect all employees' right to form or join a trade union and the right to collective bargaining. Representatives of trade unions must not be subjected to improper discrimination. RMC gives trade union representatives access to trade union members and their workplaces.

### We respect privacy

We respect the fundamental human right of privacy. Personal information must be obtained correctly and lawfully, be relevant for the purpose for which it has been obtained and be treated with utmost care.

### We strive to create a performance-driven culture

We assess the performance of our employees based on their achievement of individual targets in line with the business plan and the values expressed in this Code of Conduct.

# Information and Use of Communication Media

## We protect information as a valuable asset

Information about the company is internal or confidential, unless publicly released through annual reports, press releases, product descriptions, storytelling or other similar material intended for public use. We shall not share information with others outside the company unless there is a business reason to do so.

Company information of a technical, commercial or marketing character is of a particularly proprietary and sensitive nature. The use and distribution of such information shall be on a need to know basis. RMC employees entrusted with such information must be familiar with the confidentiality requirements and procedures regarding such information, and always ensure that the company's interests are preserved. Information shall always be assessed according to its value to ensure that it is given the proper protection level. We shall pay attention to the risk of unintentional exposure of information, for instance by discussing company matters with co-workers during transportation or in public places and so on.

## Information systems are our work tools

We use information systems professionally and as a means to continuously increase efficiency in our work processes. The company's communication tools must never be used for any unlawful or unethical purposes. Limited private use of company communication tools is acceptable if restricted to handling personal matters that do not interfere with work.

When we communicate using an information system associated with the company we always, regardless of method, represent the company. This means that we shall act respectfully and correctly,



and always be conscious of the fact that our messages may be used for purposes other than those intended. We are cautious in handling restricted information and third party proprietary information.

We treat information obtained from others in the same way as we expect them to treat information received from us, and in accordance with terms applicable to its disclosure. We do not try to access or accept receipt of proprietary information from others, unless the owner has agreed to its release. Proprietary information that is accidentally received shall not be disseminated but instead be returned to its owner. We must always be aware of our customers' regulations for protecting information for national security or export control reasons. We often need substantial amounts of information about procurement plans and other data to be able to support our customers' needs. We must however never seek to collect any information not legitimately authorized for release or disregard the conditions applicable to its disclosure to us.

## Social media

We recognize that RMC attracts significant public interest, and is actively observed and evaluated across social media platforms. We encourage our employees to use social media responsibly.

Employees must not share any confidential or proprietary information related to the company on social media.

All communication on social media should support and uphold RMC's reputation and brand. We do not publish or share content that could cause harm to the company.

# Social Responsibility

## Social engagement

RMC strives to contribute to the social development of the communities where we operate. This increases knowledge and understanding of our business on the part of those around us and leads to valuable experience and networking opportunities for the employees involved. Social initiatives must be linked to the business and mainly be accomplished with the help of RMC's employees and technology. Our contribution must always be in accordance with RMC's business ethics principles.

## Human rights

RMC respects human rights. That is why RMC has endorsed the UN Global Compact, which contains two principles concerning human rights. These principles, together with principles regarding labour, environment and anti-corruption, are embedded in this Code of Conduct, and form the basis of our Supplier Code of Conduct, and our internal policy documents.

In addition to this, RMC is committed to complying with our local laws and regulations as well as similar requirements derived from customer terms in commercial agreements, as well as similar requirements stemming from customer agreements, such as the specific U.S. -requirement FAR 52.222 50 "Compliance Plan for Combating Trafficking in Persons".

## Responsible supply chains

In contact with suppliers, we must increase awareness of the UN Global Compact. RMC has a Supplier Code of Conduct that clarifies the expectations we have on suppliers with regard to human rights, working conditions, environment and anti-corruption. This helps us promote the values for which RMC stands, safeguards quality and reduces risks in the supply chain.

# Environment

## We care for the environment

Wherever we act, we shall contribute to sustainable development. This means that we shall reduce environmental risks and minimize our footprints in the environment. Caring for the environment is a natural part of RMC's daily business and environmental requirements are implemented in our operational management systems. We also participate in both national and international co-operation and research projects to support the development of green technologies and resource efficiency. Knowledge is an important factor in order to be successful in the environmental work. We expect that our em-

ployees actively seek information about the environmental impact of our operations and products and consider ways of reducing environmental risks and our environmental footprints in any business or activities we come across.

A great part of our products and systems consist of subsystems and components developed and manufactured by our external suppliers. Hence, they have an important role in our environmental work. Therefore, our way of managing environmental matters is reflected in our procurement process through requirements and guidelines.

# Whistleblowing

## Whistleblowing means being loyal to company values

Our Code of Conduct is an essential part in creating a company-wide culture of responsibility and commitment to RMC's values. Our employees are encouraged to report any conduct that could violate appropriate laws or the Code of Conduct. It is crucial to understand that the information provided or the allegations made could have serious consequences for other employees. Therefore we urge to provide only information that is accurate to the best of knowledge available. Reports that cannot be substantiated will not justify further investigation or review.

Reports should normally be made to your manager. Where you feel that it is not appropriate, or where your concerns have not been adequately addressed, you may report to a superior manager, your human resources representative, a compliance officer, the general counsel, or through the RMC Whistleblowing – channel on the company website: <https://rmcfinland.fi/compliance/>.

Regardless of which reporting channel is used, reports will be handled confidentially. No one shall ever be discriminated or punished for reporting in good faith any suspected or observed violations of the law or of the Code of Conduct. RMC protects whistleblowers and their personal data in accordance with applicable laws.

# Implementation

If the content of our Code of Conduct is incompatible with legislation, applicable laws and regulations take precedence. This Code of Conduct is a wide-ranging but not exhaustive document.

RMC's policies, together with guidelines and instructions, provide further guidance on how the different areas are to be handled.

Every employee and contractor is personally responsible for understanding and acting in accordance with this Code of Conduct and RMC's policy documents.

All managers are responsible for ensuring that their employees are familiar with this Code of Conduct.

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