



Code of Conduct

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Speak Up

We at Kumera are committed to ethical business conduct and integrity in everything we do. Our Code of Conduct sets the minimum standards for **all employees**, regardless of role or location, and we expect our business partners to follow similar principles. All employees must read and comply with the Code. As it cannot cover every situation, you should also follow company policies and seek guidance when needed.

Message from the CEO

At Kumera, integrity is the foundation of everything we do. Our success today and in the future depends not only on what we achieve, but how we achieve it. This Code of Conduct defines the principles and behaviors that guide our daily decisions across all countries, roles, and business relationships. It sets clear expectations for everyone working at or with Kumera: to act lawfully, ethically, and responsibly, to respect people and the environment, and to always do what is right, even when no one is watching.

No code can cover every situation. When you face difficult decisions, I ask you to pause, speak up, and seek guidance. Choosing honesty and accountability even when it is uncomfortable is what protects our people and our reputation.

I am committed to lead with these principles. By living our Code of Conduct every day, we strengthen Kumera as a responsible, and trusted partner. This is a commitment I take seriously, and one I expect us all to share.

Mikko Sillanpää
CEO
Kumera Corporation



People

Health & Safety

Kumera Corporation prioritizes health and safety for employees, contractors, partners, and customers and is committed to a safe, healthy working environment with the goal of zero harm.

Top management is accountable for health and safety, and managers lead by example to promote a proactive safety culture.

Every employee is personally accountable for their own safety and the safety of colleagues and must follow all safety instructions. Every worker has the right to stop work if conditions are unsafe; work may only resume once identified risks are mitigated.

Kumera encourages to report all injuries, near misses, and safety observations and we expect everyone we work with to respect and follow our health and safety commitments and requirements.



Read the Kumera Health & Safety Policy

Human Rights

We uphold internationally recognized human rights, including the UN Universal Declaration of Human Rights. We do not permit child or forced labor in our own operations, and we require the same zero-tolerance standard from our suppliers and across the value chain.

We promote decent working conditions for employees and partners in accordance with ILO standards.

We respect employees' rights to freedom of association and collective bargaining and encourage open, constructive dialogue with employee representatives.

Fair Employment

Kumera hires and appoints employees based on individual qualifications, knowledge, and job-related skills. Discrimination on the grounds of gender, age, race, religion, ethnic or national origin, political opinion, family status, sexual orientation, gender identity, disability, or any other legally protected characteristic is not tolerated.

We value the diversity of our workforce backgrounds, talents, perspectives, education, and experience which we believe strengthens our performance and long-term sustainability by fostering innovation, adaptability, and better engagement with stakeholders.

Respectful Workplace

We value teamwork as essential to our success and expect everyone to treat colleagues with respect, courtesy, and fairness, fostering an environment where ideas can be shared openly. Any conduct by employees or others linked to our business that threatens, disrupts, or interferes with another person's work or that creates an intimidating workplace is not tolerated.

We do not tolerate misconduct of any kind, including bullying, violence, sexual harassment, punishment, or abuse.



Business Conduct

Laws & Regulations

Kumera and its subsidiaries are committed to full compliance with applicable national and international laws and regulations. Everyone who works for or represents Kumera must act in the company's best interest and conduct business with high ethical standard.

Corruption & Money Laundering

We maintain a zero-tolerance policy towards corruption and bribery and adhere to all applicable national and international anti-corruption laws. Employees are prohibited from offering, promising, giving, requesting or acceptance any improper advantage to obtain or retain business or to influence decisions. We do not engage in, facilitate, or support any business transaction that would breach anti-money laundering or terrorist financing laws.

Gifts & Entertainment

Gift, hospitality and entertainment can only be given or accepted when they are customary, modest and occasional. Gifts of cash or cash equivalents are not allowed.

Conflict of Interest

Employees and board members must avoid situations that create actual or apparent conflict between personal interests and Kumera's interests. Personal financial interests or other activities that could improperly influence decisions should be disclosed to the local management.

Third Parties

Kumera selects suppliers and partners based on objective factors, such as quality, reliability, delivery and price. Suppliers are expected to comply with the Code of Conduct principles and follow applicable laws.

Government Relations

Kumera interacts with governmental authorities with integrity. We remain politically neutral and do not make donations to any political party or candidate.

[Read the Kumera Trade Compliance Policy](#)

Company Information

We keep accurate, compliant records under internal controls and publish regular financial and non-financial reports. We provide stakeholders with transparent, unbiased performance information and protect sensitive data, sharing it only through authorized channels.

Competition

We commit to fair, transparent competition and comply with all competition laws. We do not participate in price-fixing, market or customer allocation, bid rigging, unlawful bundling, exchanging competitively sensitive information, or any other anti-competitive arrangements with customers, suppliers, agents, distributors, consultants, or other partners.

Trade Compliance

We comply with applicable trade sanctions, export controls, and tariff regulations. We support responsible trade, avoid the use of conflict minerals, and expect our suppliers to follow the same standards.



Company Assets

Privacy

We are committed to collecting, processing, and retaining personal data of employees and business partners in accordance with applicable data protection laws and regulations, and only for legitimate business purposes.

Intellectual Property & Company Property

We protect our intellectual property (IP) through controlled disclosure, confidentiality, licensing, and other appropriate measures. We also respect others' IP and do not use it without permission.

IP covers registered rights (patents & trademarks) and unregistered rights (trade secrets, copyrights and know-how). IP is a core business asset and holds significant value that must be safeguarded.

Company assets, facilities and resources are provided to fulfill business purposes. Employees are expected to use company property responsibly and protect company property against loss, theft or misuse.

IT & Cybersecurity

Employees must adhere to IT guidelines to protect Kumera's systems, networks and data. We must protect our IT infrastructure from unauthorized access, viruses, cyber-attacks, phishing, damage, and theft. Employees must not use company devices or systems to access, store, or upload illegal or inappropriate material from the internet or other sources, including social media.

Brand & Reputation

When representing or interacting on behalf of Kumera, we must promote and safeguard the company's reputation and behave in a respectful and appropriate manner.



Sustainability

Environment

Kumera is committed to reducing its environmental impact across all operations and supporting sustainable development and climate action. The company sets science-based climate targets: cutting GHG emissions 50% by 2030 (from a 2024 baseline) and 90% by 2050, while aligning reporting with the GHG Protocol and relevant sustainability standards.

Kumera promotes circularity and resource efficiency, designs solutions to improve customer energy performance, and requires suppliers to meet environmental standards.

Quality & Product Compliance

Kumera is committed to delivering reliable, sustainable technologies, products, and services that meet customer needs and support long-term partnerships and operational excellence.

We foster a culture of accountability, professionalism, and continuous improvement. Our quality management is based on ISO 9001 principles. Kumera set clear targets, monitor performance, and maintains competence to prevent defects and manage risks. Suppliers are required to meet the same standards.

[Read the Kumera Environmental Policy](#)



Speak Up!

We encourage employees and stakeholders to speak up and raise concerns. We ask employees to contact their manager or another appropriate colleague whenever they are uncertain about the right course of action—ask before you act.

Managers are required to listen carefully, take concerns seriously, and follow up with appropriate measures to investigate and resolve issues. We protect the confidentiality of anyone reporting suspected violations and prohibit any form of retaliation against those who, acting in good faith, raise concerns or assist in investigations.

Employees must report suspected breaches of the Code of Conduct or other misconduct to their manager or to HR; failing to report known or suspected misconduct is regarded as unethical and may lead to disciplinary action.

We also provide channels and support for those who report concerns and commit to timely, fair, and transparent handling of all reports.



Kumera Corporation is a global technology and service provider for demanding industrial and marine applications. The corporation consists of four major operating divisions.

Power Transmission group provides a comprehensive range of products for a wide variety of applications in all the major process industries. Kumera has more than 70 years of experience as manufacturer of mechanical power transmissions for the industrial market. There are more than 200,000 Kumera gear units in operation in about 40 countries.

Kumera Marine Division engineers and manufactures propulsion gearboxes and propellers including control systems for any seafaring vessels.

Technology Division is specialized in process equipment for metallurgical and environmental industries.

Foundry Division produces all types of steel and iron castings, forming a link in the vertical refining chain of Kumera Corporation.