

Business code of conduct

16.7.2020

Responsibility is more than just a word for us. It is displayed in our everyday actions. Responsible business activities are crucial for achieving sustainable financial results. All our operations are built on trust between Lahti Glass Technology, our customers and business partners.

We operate in an increasingly globalized world, where many conventions and guidelines have an impact on the operations of Lahti Glass Technology. Our responsibility is global. Our core commitments are stated in the general principles of corporate responsibility.

Anti-corruption policy including bribery

Lahti Glass Technology has zero tolerance for corruption including bribery as well as other unreasonable payments and benefits in business. Giving a bribe includes all actions that encourage inappropriate operation or taking advantage of a person's position. In addition to a monetary bribe, gifts, hospitality, credit, discounts, travel, personal benefits, accommodation and services may be regarded as unreasonable or inappropriate benefits. Offering, authorizing, asking for, approving or accepting these kinds of payments and benefits are forbidden.

Antitrust and competition policy or guidelines

Lahti Glass Technology promotes sound and effective economic competition in the markets in which it operates and complies with all applicable competition and antitrust laws. Lahti Glass Technology will not enter into or accept any mutual agreements or practices between competing undertakings that may limit competition.

Child labor policy

We will not use child labor. We will comply with all minimum age provisions of applicable laws and regulations.

Code of conduct applicable to suppliers and subcontractors

We expect our subcontractors and suppliers to separate personal interests from business/professional interests and to avoid any appearance of conflict of interest. Presents and gifts from and to internal parties as well as from and to external parties, shall never affect the process of decision making. Subcontractors and suppliers are to handle their business at all times with a clear conscience. Abuse of position shall in no case be acceptable.

Conflict minerals policy

Lahti Glass Technology does not use conflict minerals such as tin, tantalum, tungsten or gold. Conflict areas refer to the Democratic Republic of Congo and neighboring countries, as defined in the Dodd Frank Conflict Mineral Legislation. Lahti Glass Technology also places demands on suppliers regarding responsible extraction of raw materials and does not accept activities that contribute to conflicts in extraction areas.

Data privacy

We respect privacy. We will only collect personal data on legal grounds and for our reasonable, necessary and transparent business purposes. We process personal data carefully, ensure data quality and confidentiality.

Equal opportunity policy

It is self-evident that all people are equal. Lahti Glass Technology strives to increase diversity and equality in all areas of operations. Everyone shall have equal rights and equal opportunities regardless of gender, gender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age.

Freedom of association and collective bargaining

We respect the rights of employees to associate or organize without fear of reprisal or interference. If employees are represented by an organization recognized under law, we respect the bargain collectively.

Gifts & entertainment policy

We do not accept, offer or provide any unlawful financial benefits from or to any authorities, customers, suppliers or other third parties. We do not make, offer or promise to offer any payments or valuables to any third party with the purpose of getting a favorable business decision or action

Grievance mechanisms & disciplinary guidelines

Employees shall be treated with dignity and respect. We expect our business partners to prohibit the use of corporal punishment and physical, sexual, psychological, verbal or any other form of harassment, abuse or coercion.

Hazardous substances managed in compliance with all applicable laws and regulations for recycling & disposal

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Insider trading policy

Team members who have material non-public information about the Company or other companies such as suppliers and customers, are not to trade in securities of those companies as prohibited by law and Company policy. Team members are not to share material non-public information with anyone else who might trade in securities based on the information.

Materials sourced in compliance with all applicable laws and regulations

We are compliant with all the relevant legislation and official regulations as well as Finnish and international agreements. Each employee must be familiar with the laws, regulations and agreements concerning their own work. Supervisors are responsible for delivering the required inductions and for monitoring employees performance. In situations where there is uncertainty, employees should consult their supervisor or another person in charge.

Non-harassment policy

Any kind of discrimination or harassment by or against colleagues, customers or suppliers has no place at Lahti Glass Technology and will not be tolerated.

Policy of conflicts of interest

Lahti Glass Technology employees, managers and directors are expected to promote the interest of Lahti Glass Technology and, while doing so, to act responsibly and avoid any activity which may lead to a conflict of interest. Personal and private financial, political or other personal interests are not allowed to influence business decisions, since they may conflict with the interests of Lahti Glass Technology or our business partners. Decisions by or for Lahti Glass Technology shall never be influenced by personal preferences or relationships.

Policy on forced, slave, conflict or bonded labor

We are committed to respecting internationally recognized human rights in all our operations and promoting them in practice. We don't tolerate human rights violations in any form.

Trace & import restrictions policy

As a global company, Lahti Glass Technology serves the needs of our customers worldwide through the delivery of products and services. All import, export and re-export activities and/or transactions shall be conducted in full compliance with all applicable import and export control laws, regulations, sanctions, embargoes and policies. This includes recognizing potentially illegal boycott requests under all applicable laws.