

Champion Door Code of Conduct

1. Purpose and Scope

Champion Door is committed to conducting business in a lawful, ethical and responsible manner. This Code of Conduct sets out the minimum standards that guide Champion Door's own operations and the conduct expected from employees, management and persons acting on behalf of Champion Door.

Champion Door also expects its suppliers, subcontractors, manufacturers, distributors, resellers, agents, consultants, installers, logistics partners and other business partners to comply with equivalent standards when conducting business with or on behalf of Champion Door.

This Code applies to Champion Door's employees, management, business operations and persons acting on behalf of Champion Door. It applies to all relevant functions, including sales, procurement, project management, engineering, production, installation, service, logistics, finance, administration and management.

This Code also applies, where relevant, to business partners that provide products, materials, components, services, labour, logistics, installation, consulting, sales representation, distribution or other support to Champion Door or act on behalf of Champion Door in any market.

In this Code, Know Your Customer (KYC) means a risk-based approach to identifying and assessing relevant customer-side parties and circumstances, such as customers, end-users, delivery recipients, payers, distributors, resellers, agents, end-use, use location and possible resale or re-export risk, where such information is relevant to Champion Door-related business.

Know Your Supplier (KYS) means a risk-based approach to identifying and assessing relevant procurement-side and supply chain parties and circumstances, such as suppliers, manufacturers, subcontractors, logistics providers, material sources, payment recipients, origin information and supply chain risk, where such information is relevant to Champion Door-related business.

Employees and managers are expected to understand and follow this Code in their daily work, seek guidance when uncertain, and report concerns in good faith.

Business partners are expected to apply equivalent standards in Champion Door-related business and, where appropriate, communicate these requirements to relevant employees, representatives, subcontractors and supply chain participants involved in Champion Door-related work. Champion Door does not require unnecessary documentation or controls where no relevant legal, ethical, sanctions, safety, quality or reputational risk has been identified.

Compliance with this Code does not replace any obligation to comply with applicable laws, contracts, customer requirements or regulatory obligations. If this Code, applicable law, a contract or a customer requirement sets different standards, the stricter standard shall apply, unless prohibited by mandatory law.

2. Compliance with Laws and Authority Requirements

Champion Door, its employees and business partners shall comply with all applicable laws, regulations, authority requirements, permits, licences, customs requirements, import and export rules, tax obligations, occupational safety rules, environmental requirements and documentation obligations in the countries where Champion Door operates or where Champion Door-related products, services, materials or projects are delivered.

This includes where applicable:

- anti-corruption and anti-bribery laws;
- competition and antitrust laws;
- sanctions, export control, import control and customs rules;
- anti-money laundering and counter-terrorist financing requirements;
- labour, employment and occupational safety laws;
- environmental laws and permits;
- data protection, confidentiality and information security requirements;
- product safety, construction, installation and technical compliance requirements;
- public procurement, defence, aviation, security and other authority requirements.

Employees, managers and business partners shall not take any action, directly or indirectly, that would cause Champion Door to violate applicable laws, sanctions, export controls, import restrictions, public procurement requirements, local authority requirements or contractual obligations.

In public, infrastructure, aviation, defence, security or government-related projects, Champion Door employees, managers and business partners shall act with appropriate care. They shall support transparency, accurate documentation, proper handling of confidential information and fair conduct in commercial interactions.

The level of review and documentation shall be proportionate to the nature of the project, applicable legal requirements, customer requirements and identified risks.

3. Business Integrity, Anti-Corruption and Fair Competition

Champion Door does not tolerate bribery, corruption, extortion, fraud, embezzlement, improper influence, facilitation payments, money laundering or misleading business practices in any form.

Employees, managers and business partners shall not, directly or indirectly, offer, promise, give, request, accept or authorise anything of value to obtain or retain business, influence a decision, secure an improper advantage or reward improper conduct.

This prohibition applies to dealings with:

- public officials and government entities;
- private sector customers and suppliers;
- public procurement authorities;
- defence, aviation and infrastructure sector customers;
- employees, representatives, agents, consultants and intermediaries;
- any person acting on behalf of a customer, supplier or authority.



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3.1. Gifts, Hospitality and Expenses

Gifts, hospitality, travel, entertainment, sponsorships or other benefits shall always be reasonable, transparent, lawful, accurately recorded and connected to a legitimate business purpose.

Employees, managers and business partners shall not offer or accept gifts, hospitality or other benefits that may influence, or appear to influence, a business decision, tender, technical evaluation, inspection, approval, certification, payment or other commercial outcome.

Cash, cash equivalents, personal benefits, hidden commissions and improper third-party payments are prohibited.

3.2. Conflicts of Interest

Employees, managers and business partners shall avoid conflicts of interest that could affect, or appear to affect, impartial business decisions relating to Champion Door.

A conflict of interest may arise, for example, from personal relationships, ownership interests, outside employment, side agreements, commissions, gifts, family relationships or other private interests connected to Champion Door's customers, suppliers, competitors, employees or representatives.

Actual or potential conflicts of interest shall be disclosed to Champion Door without undue delay.

3.3. Fair Competition

Champion Door competes fairly and complies with applicable competition and antitrust laws. Employees, managers and business partners shall act accordingly in Champion Door-related business.

Employees, managers and business partners shall not engage in price-fixing, bid-rigging, market sharing, customer allocation, exchange of competitively sensitive information, abuse of confidential competitor information or any other practice that restricts fair competition.

Business partners acting as distributors, resellers, agents or sales representatives shall not use Champion Door-related cooperation to restrict competition unlawfully or exchange prohibited market information.

3.4. Accurate Business Records

Champion Door shall maintain accurate and complete business records. Business partners shall maintain accurate and complete business records relating to Champion Door business. Invoices, customs documents, delivery documents, certificates, technical documentation, quality records, origin documents, payment records and compliance information shall be truthful, complete and not misleading.

Employees, managers and business partners shall not falsify, conceal, alter or misrepresent documents, product descriptions, customs codes, origin information, end-user information, payment data, inspection results, quality records or other relevant information.

4. Sanctions, Export Control and Risk-Based Due Diligence

Champion Door requires compliance with applicable sanctions, export controls, import restrictions, customs rules, anti-money laundering requirements and other trade compliance obligations.

Employees, managers and business partners shall not knowingly participate in any transaction, delivery, service, payment, resale, re-export, transfer, installation, maintenance, technical assistance or supply chain arrangement that would violate or circumvent applicable sanctions, export controls, import restrictions or other trade regulations.

This obligation applies to both sales and procurement activities. It covers customers, end-users, distributors, resellers, agents, suppliers, manufacturers, subcontractors, logistics providers, materials, components, services, technology, technical information, payment flows and delivery routes.

Champion Door may apply risk-based Know Your Customer (KYC) and Know Your Supplier (KYS) checks where a transaction, customer, supplier, end-user, delivery route, payment arrangement, material origin, ownership structure or other circumstance gives reason for additional review.

Champion Door may request information, documentation or assurances concerning, for example:

- the customer, end-user, end-use, delivery recipient or installation location;
- the supplier, manufacturer, material or component origin;
- the contracting party, payer, payment recipient, bank or ownership structure;
- intermediaries, resellers, agents, subcontractors or logistics providers;
- delivery routes, resale, transfer or re-export risk;
- sanctions, export control, import control, customs or other trade compliance matters.

The scope of any review shall depend on the nature and risk of the transaction. This Code does not require the same level of review or documentation for all customers, suppliers, projects or transactions.

Champion Door's sanctions and trade compliance assessment may be based on official and applicable sources, including, where relevant:

- EU Sanctions Map;
- EU Consolidated Financial Sanctions List;
- European Commission list of high-risk third countries for AML/CFT purposes;
- European Commission guidance and legal instruments concerning sanctions circumvention;
- EU Common High Priority Items and related due diligence obligations, where applicable;
- other mandatory sanctions, export control or trade compliance rules applicable to the transaction.

Champion Door does not rely on a static internal country list in this Code. Additional review may be triggered by official sanctions and trade compliance sources, applicable legal requirements, customer or project requirements, or identified risk indicators.



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Champion Door-related products, components, technology, services or technical information shall not be sold, transferred, re-exported, installed, serviced, sourced or otherwise made available in violation of applicable law or Champion Door requirements.

Employees, managers and business partners shall promptly inform Champion Door if they become aware of any actual or suspected sanctions, export control, import restriction, diversion, re-export, circumvention, end-use, end-user, material origin, payment, ownership or supply chain risk connected to Champion Door business.

Champion Door may suspend, refuse or terminate a transaction, delivery, payment, project, purchase or business relationship if requested information is not provided, is incomplete or misleading, or if Champion Door considers that the legal, sanctions, export control, ethical or reputational risk cannot be resolved satisfactorily.

5. Human Rights, Labour Standards and Prevention of Forced Labour

Champion Door respects internationally recognised human rights and complies with applicable labour laws and standards. Employees, managers and business partners are expected to respect the same principles in Champion Door-related business.

Champion Door and its business partners shall not use, tolerate or benefit from forced labour, bonded labour, child labour, human trafficking, modern slavery, abusive recruitment practices, withholding of identity documents or wages, coercion, intimidation, violence, threats, unlawful discrimination, harassment or degrading treatment.

Employment shall be voluntary. Workers shall be treated with dignity and respect. Recruitment, compensation, promotion, discipline and termination decisions shall not be based on unlawful discrimination.

Champion Door and its business partners shall comply with applicable laws on working hours, wages, benefits, rest periods, employment contracts and freedom of association, subject to local legal requirements.

Business partners are expected to take reasonable steps to ensure that equivalent human rights and labour standards are respected by their own subcontractors and supply chain participants involved in Champion Door-related business. The scope of such steps shall be proportionate to the nature of the work, the role of the business partner and the risks identified.

6. Health, Safety, Environment, Quality and Product Responsibility

Champion Door's products and services may be used in demanding industrial, aviation, infrastructure and specialised environments. Champion Door and its business partners shall therefore apply appropriate standards of health, safety, quality, environmental responsibility and product compliance.

6.1. Health and Safety

Champion Door and its business partners shall provide safe and healthy working conditions for employees, subcontractors and others affected by their operations.

Champion Door and its business partners shall comply with applicable occupational health and safety laws, maintain appropriate safety procedures, provide necessary training and protective equipment, and report serious accidents, near misses or safety risks related to Champion Door business.

Employees, managers and business partners involved in installation, service, maintenance, site work or logistics shall ensure that their personnel are competent, properly instructed and able to perform work safely.

6.2. Environment

Champion Door and its business partners shall comply with applicable environmental laws, permits and reporting obligations.

Champion Door and its business partners shall manage environmental impacts responsibly, including energy use, emissions, waste, chemicals, hazardous substances, packaging, recycling and transport impacts. Environmental information provided to Champion Door shall be accurate and not misleading.

Employees, managers and business partners shall notify Champion Door of significant environmental risks, incidents or non-compliance that may affect Champion Door-related products, services, projects or reputation.

6.3. Quality and Product Responsibility

Champion Door and its business partners shall provide products, materials, components and services that meet agreed specifications, applicable standards, safety requirements and quality requirements.

Product responsibility includes, where relevant, design, manufacturing, installation, maintenance, service documentation, instructions, conformity documentation and timely reporting of safety-related defects or non-conformities.

Employees, managers and business partners shall not knowingly supply, approve or accept defective, unsafe, counterfeit, non-conforming or falsely documented products, materials, components or services.

Employees, managers and business partners shall promptly inform Champion Door of any actual or suspected quality, safety, conformity, origin, documentation or product integrity issue affecting Champion Door-related business.



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7. Confidentiality, Information Security and Intellectual Property

Employees, managers and business partners shall protect Champion Door's confidential information, customer information, technical information, commercial information and intellectual property.

Confidential information may include, for example:

- drawings, designs and technical documentation;
- product specifications and engineering information;
- project data and site information;
- customer and end-user information;
- pricing, cost and commercial data;
- contracts and negotiation information;
- production, installation and maintenance information;
- business plans and market information;
- compliance, sanctions, KYC/KYS or risk assessment information.

Employees, managers and business partners shall use confidential information only for authorised business purpose and shall not disclose it to unauthorised parties. Appropriate technical and organisational measures shall be used to prevent unauthorised access, loss, misuse, alteration or disclosure.

Personal data shall be processed lawfully, fairly, securely and only for legitimate business purposes. Employees, managers and business partners shall protect personal data against unauthorised access, loss, misuse, alteration or disclosure in accordance with applicable data protection requirements.

Employees, managers and business partners shall respect Champion Door's and third parties' intellectual property rights, including patents, trademarks, copyrights, designs, trade secrets, know-how and proprietary technical information.

Any suspected unauthorised disclosure, cyber incident, data breach, misuse of confidential information or infringement of intellectual property related to Champion Door business shall be reported to Champion Door without undue delay.

8. Documentation and Records

Champion Door and its business partners shall maintain accurate, complete and verifiable records relating to Champion Door business where such records are required by law, contract, customer requirement, quality requirement or identified risk.

Relevant records may include, where applicable, contracts, purchase orders, invoices, payment records, delivery documents, customs documents, certificates of origin, material declarations, quality records, installation and service documentation, compliance declarations, end-use statements, corrective action records and other information relevant to the transaction.

Relevant checks, decisions and supporting information should be documented in a manner proportionate to the risk and the nature of the transaction.

Upon reasonable request, business partners shall provide Champion Door with information and documentation necessary to verify compliance with this Code, applicable laws and contractual obligations.

Employees, managers and business partners shall not destroy, alter, conceal or falsify records relevant to an actual or potential investigation, audit, dispute, authority request, compliance review or suspected breach.

9. Reporting Concerns and Whistleblowing

Employees, managers, business partners and other stakeholders are encouraged to report actual or suspected breaches of applicable laws, sanctions, export control requirements, this Code, contract obligations or ethical business standards related to Champion Door business. Reports should be made in good faith and based on a genuine concern.

Reports may concern, for example, bribery, corruption, sanctions circumvention, export control concerns, unclear end-use or end-user, false documentation, inaccurate records, conflicts of interest, anti-competitive conduct, forced labour, child labour, human trafficking, unsafe working conditions, product safety risks, environmental violations, misuse of confidential information or retaliation against a person raising a concern.

Reports may be made to the relevant Champion Door contact person, a management representative or through the whistleblowing channel maintained by Champion Door.

The whistleblowing channel is intended for reporting suspected abuse, unethical conduct or illegal activities. General feedback, customer complaints, technical support requests or ordinary customer service matters should be directed to the appropriate Champion Door contact or customer service channel.

Champion Door will review reported concerns in an appropriate and confidential manner, taking into account the nature and seriousness of the matter. Champion Door may request additional information and may keep the reporting person updated on the progress of the case where appropriate.

Champion Door expects employees, managers and business partners to cooperate in good faith in the review and investigation of reported concerns.

Retaliation against any person who raises a concern in good faith or cooperates in an investigation is not accepted.

10. Right to Request Information, Suspend or Terminate

Champion Door may request information, documentation, declarations, self-assessments or assurances from business partners, and relevant information or explanations from employees and managers, where necessary to verify compliance with this Code, applicable laws, customer requirements or contractual obligations.

The scope of such requests shall be proportionate to the nature and risk of the matter. Champion Door does not require unnecessary documentation where no relevant risk or requirement has been identified.

If Champion Door identifies non-compliance, suspected non-compliance or a material risk, Champion Door may require clarification or corrective action.



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Depending on the severity of the issue, Champion Door may take one or more of the following actions:

- request additional information or documentation;
- require corrective actions;
- suspend orders, deliveries, payments, purchases or project activities;
- reject products, materials, components or services;
- restrict or terminate the business relationship;
- exclude a business partner from future tenders or business opportunities;
- notify customers, authorities or other relevant parties where required or appropriate;
- pursue contractual or legal remedies.

Serious breaches, repeated breaches, failure to cooperate, false information, sanctions violations, corruption, forced labour, child labour, human trafficking, deliberate falsification of documents or unresolved safety risks may lead to disciplinary action, suspension of activities, termination of contract or business relationship, exclusion from future business opportunities, authority notification or other appropriate legal or contractual remedies.

11. Commitment

Champion Door is committed to applying this Code in its own business operations and expects its employees, managers and persons acting on behalf of Champion Door to follow it in their work.

Business partners are expected to understand and comply with equivalent standards when conducting business with or on behalf of Champion Door.

Champion Door may require business partners to confirm compliance with this Code through written acknowledgements, supplier declarations, self-assessments, contractual commitments or other reasonable means, where appropriate.

By entering into or continuing a business relationship with Champion Door, the business partner confirms that it will act in accordance with the principles and requirements set out in this Code, unless otherwise agreed in writing or prohibited by mandatory law.

Champion Door may update this Code from time to time to reflect changes in law, regulatory requirements, customer expectations, business risks or responsible business practices.



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