

CTT Systems'

Code of Conduct

For suppliers and business partners



2026-03-30

1. Introduction

1.1 Background

CTT Systems has a value-based approach to sustainability and strives to integrate sustainable thinking in everything it does, in both the short and the long term. Sustainability is an important driving force for CTT Systems' product development and its efforts to minimise the environmental impact of its operations. Conducting business ethically in all regards alongside offering attractive, responsible workplaces are other essential elements of CTT Systems' sustainability initiatives. Creating a sustainable, value-creating business is based on integrating the entire chain into sustainability efforts, from supplier to customer.

As a signatory to the United Nations Global Compact, CTT Systems is committed to promoting its core values regarding human rights, labour, environmental sustainability, and anti-corruption practices. Therefore, CTT Systems requires suppliers and business partners to adhere to the standards and requirements of this Code of Conduct. The code is based on international standards and guidelines, including the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, and OECD Guidelines for Multinational Enterprises.

1.2 Compliance with laws

Suppliers and business partners shall comply with all applicable laws and regulations of the countries in which operations are managed or services provided.

1.3 Monitoring

Suppliers and business partners shall continuously evaluate their performance against the standards set forth in this code and make improvements in relevant areas. They must be able to confirm their compliance with these requirements upon request from CTT Systems. Additionally, CTT Systems reserves the right to conduct audits, site visits and self-assessment questionnaires to verify compliance. Suppliers and business partners are also responsible for ensuring that the principles of this code are respected throughout their own value chains.

1.4 Consequences of violation

If the expectations outlined in this code are not met, the relationship with the supplier or business partner may be reviewed, and corrective action may be taken in accordance with the terms of the contracts, applicable laws and labour agreements.

2. Human rights and working conditions

2.1 Child labour

CTT Systems tolerates neither child labour nor any other form of child exploitation. According to the ILO Convention No. 138, a “child” is defined as any person under the age of 15. If local laws stipulate a higher age for compulsory education and employment, the higher age will apply.

Suppliers and business partners must also adhere to legal requirements for employing individuals under the age of 18, ensuring that no risks to health, safety, moral, or social well-being are present.

2.2 Forced labour and human trafficking

Suppliers and business partners shall not engage in or support any forms of forced labour, including bonded labour, modern slavery, and work under threat of penalty. CTT Systems requires that suppliers and business partners must comply with regulations prohibiting human trafficking and adhere to all applicable local laws in the countries where they operate. Additionally, they shall respect the rights of others and address any adverse human rights impacts of their operations.

2.3 Harassment

CTT Systems requires that suppliers and business partners provide a workplace environment free from physical, psychological, verbal, and sexual harassment, as well as any other forms of abusive conduct. Additionally, they should treat employees with respect and dignity, encourage diversity, remain open to diverse opinions, promote equal opportunities for all, and foster an inclusive and ethical culture.

2.4 Non-discrimination

Suppliers and business partners must ensure equal employment opportunities for all employees and job applicants, free from discrimination. Hiring, promotion, development, and compensation decisions shall be based solely on the individual’s abilities and skills relevant to the job. These decisions must never be influenced by irrelevant factors such as sex, age, colour, racial and ethnic origin, religion, disability, gender identity, sexual orientation, political affiliation, national extraction or social origin.

2.5 Freedom of association and collective bargaining

Employees of suppliers and business partners shall have the right to freely form, join, and associate with labour organizations and to bargain collectively in accordance with applicable laws and regulations. Additionally, they must respect workers’ rights to communicate openly with management about working conditions without fear of harassment, intimidation, penalties, or other types of reprisal.

2.6 Working hours, wages and benefits

CTT Systems requires that suppliers and business partners comply with applicable laws and collective bargaining agreements regarding working hours, rest periods, overtime compensation, and breaks. They must pay workers at least the minimum wage mandated by local law and provide all legally required benefits. In addition to regular wages, workers must be compensated for overtime at the legally required premium rate or, where no such laws exist, at a rate at least equal to their regular hourly wage. Wage deductions as a disciplinary measure are not permitted.

Employees must be informed of the terms and conditions of their employment, including salary, overtime compensation, and benefits, through a written contract in a language they understand.

2.7 Health and safety

Suppliers and business partners shall provide a safe and healthy working environment for their employees. This includes ongoing efforts to minimize the risks of work-related incidents, injuries, and health hazards. CTT Systems strictly requires that suppliers and business partners comply with all applicable health and safety laws and regulations.

Suppliers and business partners should systematically track, report, and manage work-related accidents and injuries, and identify potential hazards to mitigate to prevent future incidents.

3. Business ethics

3.1 Anti-corruption and bribery

CTT Systems tolerates no forms of corruption, bribery, or fraud. Suppliers and business partners must refrain from offering or accepting any improper payments or anything of value intended to influence decision-making or gain an unfair advantage. It is also unacceptable to gain unfair advantage through fraud or inappropriate business courtesies.

Suppliers and business partners should exert reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

3.2 Conflict of interest

Suppliers and business partners of CTT Systems shall avoid any conflicts of interest or situations that could appear as potential conflicts of interest. They should notify all affected parties if an actual or potential conflict of interest arises. Suppliers and business partners must avoid situations where personal, family, or financial interests affects their objectivity and decision making or interfere with their work responsibilities.

3.3 Competition and anti-trust

Suppliers and business partners must adhere to laws and regulations concerning fair competition. They must not engage in price fixing, bid rigging, market allocation, or participate in cartels with competitors.

3.4 Import and export controls

Suppliers and business partners must ensure that all business practices comply with applicable laws, directives, and regulations governing the import and export of goods and services.

3.5 Sourcing of minerals

CTT Systems requires compliance with applicable laws and regulations regarding conflict minerals, including tin, tungsten, tantalum, and gold. Suppliers and business partners should conduct due diligence in their supply chain if these minerals are present in their products, to ensure traceability and responsible sourcing.

3.6 Protection of data and confidential information

Suppliers and business partners must comply with applicable data privacy laws when collecting, storing and managing personal information. Additionally, they must protect any confidential information and ensure it is not used for any purpose (e.g. advertisement, publicity, etc.) other than the business purpose for which it was provided, unless prior authorization is obtained from the information owner. Confidential information includes, but is not limited to, business secrets, customer and supplier information, technical data, financial information, and personal data relating to employees or other parties.

4. Environment

4.1 Environmental management system

Suppliers and business partners shall comply with all applicable environmental laws, regulations, and permits. They shall maintain an appropriate and effective environmental management system that ensure continuous improvement in reducing the environmental impact from operations, products, and services.

4.2 Climate impact and greenhouse gas emissions

CTT Systems encourages all suppliers and business partners to establish measurable goals and take actions to reduce greenhouse gas emissions in alignment with the objectives of the Paris Agreement. Additionally, they shall, upon request, be able to report relevant environmental data, including greenhouse gas emissions, energy use, and other significant environmental impacts.

4.3 Resource and waste management

Suppliers and business partners shall manage waste, chemicals, and hazardous materials in a safe and responsible manner and in accordance with applicable laws and regulations. Efforts should be made to promote efficient use of resources, reduce waste, and increase reuse and recycling where feasible.

5. Reporting of concerns

CTT Systems expects suppliers and business partners to provide appropriate channels for employees, suppliers, and other stakeholders to raise concerns, complaints, or recommendations about the workplace, the environment, or their practices without fear of retaliation. Additionally, they are expected to take actions to prevent, detect, and correct any retaliatory actions.

If a supplier, business partner, their employees, or other stakeholders believe that certain practices or business activities interfere with the terms and conditions of this Code of Conduct, CTT Systems encourages such concerns to be raised via the whistleblowing channel:

[CTT Systems' whistleblowing channel](#)