RESPONSIBILITY AT MIPRO GROUP LTD OY

COMMUNICATION ON PROGRESS (COP) REPORT 2018

MIPROGROUP

MIPRO GROUP LTD OY - COMMUNICATION ON PROGRESS (COP) REPORT

GENERAL

This document is the Communication on Progress (COP) report for Mipro Group Ltd Oy covering the reporting period of 01.05.2018 – 30.4.2019.

STATEMENT BY THE CHAIRMAN OF THE BOARD

27 April 2019

To our stakeholders,

We are pleased to confirm that Mipro Group Ltd Oy and its subsidiaries support the United Nations Global Compact, including each of the Ten Principles in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress report, we describe our actions of integrating the Global Compact and its principles into our business strategy, company culture and daily operations. We commit to share this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Shu ho

Stiina-Maria Snäll Chairman of the Board

At Mipro Group, we have always been concerned about doing the things we do for the community. Operating in the field of functional and environmental safety, we understand our responsibility and impact on providing safe and functional solutions for mass transportation and providing clean water. ΠΠ.

ABOUT THE COMPANY AND COP

At Mipro Group, our work has always been engaged in building safe and well-functioning communities. Reliable and responsible operations have always been an integral part of Mipro Group's activities, vision and values. Throughout the company's history, it has been of the highest importance for the owners and the management to do things right and keep our promises.

The Group has special expertise in functional safety; we supply safety related solutions to rail traffic and water supply ensuring the safety of public transport, environment, water supply and drinking water. Customers and the legislation set strict requirements for our products and services in regard to reliability and functionality. Hence, responsibility is highly important for us in our daily business.

Reporting on our social responsibility has become not only a great tool for improving our operations, but also a way to remind ourselves why we are in this business in the first place. We want to actively be part of building and improving communities, and see the value and opportunity in building a successful company through both our local and global involvement in social responsibility.

Responsibility reporting and endeavours are important for us; we communicate our values to our stakeholders through them, and encourage other small and mediumsized enterprises to participate. We strive to be in that group of companies that has a pervasive approach to corporate social responsibility, and have made it a natural part of their daily operations. In recent years our customers, personnel and job applicants have had a growing interest in corporate responsibility. Matters of responsibility are increasingly discussed; employees have taken initiatives related to responsibility.

MIPRO

WE ARE A RELIABLE EXPERT COMPANY AND TRUSTWORTHY PARTNER. WE COMPLY WITH THE FOLLOWING OPERATING POLICY.

WE LISTEN TO

We listen to the customer: what are their problems and needs. We provide systems and services according to our customers' needs at all life-cucle phases.

WE PAY ATTENTION TO

We pay attention to the group's objectives, profitability and competitiveness. We develop our operations to improve our performance.

WE ACT

We do right things at the right time. We keep what we have promised. We act reliably and follow the requirements of customers and authorities, and comply with the agreed operating policy. We ensure the correct quality and safety in all tasks.

WE DEVELOP

We develop our own skills and expertise and that of our team on a continuous basis. We develop innovative, cost-effective and environmentally friendly solutions to meet customer peeds

FOCUS ON STRENGTHENING BASIC VALUES

The Group has evolved in recent years. Our operations and the number of employees have grown considerably. In the midst of all change and growth we are committed to long-term continuity and our goal is to retain and strengthen our basic values, our commitment to the ten UNGC Principles [https://www.unglobalcompact.org/ what-is-gc/mission/principles] and our long-term operating policy of doing the right thing.

Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

Labour

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

SUSTAINABLE DEVELOPMENT GOALS

The UN Global Compact is driving business awareness and action in support of achieving the UN's 2030 Agenda for Sustainable Development and the 17 Sustainable Development Goals (SDGs).

Since we supply safety related systems to rail traffic and water supply, our solutions have a direct impact on a number of the SDGs. We can have a significant positive effect on these goals locally, as we conduct our business responsibly and strive for new enhanced solutions.

Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

• Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Although as a regional medium -sized company our impact in the global context is relatively small, we believe that even the smallest act is of great significance for achieving the SDGs. In our own operations, we have already set our standards at a high level, in terms of SDGs, however, we recognise the risk of adverse development and the need for continuous effort going forward.



HUMAN RIGHTS PRINCIPLES

ASSESSMENT, POLICY AND GOALS

Our goal is to adhere to all aspects of the Declaration of Human Rights, and through our own example and actions influence all our stakeholders and business partners to set their standards to a similar level.

As a company primarily based in Finland, Mipro Group adheres to Finnish laws and regulations. On that account, our standard on enforcing human rights is already at a high level. However, we do not wish to be complacent about our own and current partners' actions. Instead we have to look for ways to ensure that we will not be part of any human rights infringements either due to our own actions or even implicitly.

IMPLEMENTATION AND OUTCOMES

Our employees have been informed of the contents of the Declaration of Human Rights, and have been advised to look for and report any breaches of its contents caused either by our own actions or by our stakeholders. The Management System is reviewed periodically to ensure that human rights principles are appropriately taken into account in our daily operations.

Mipro Group has not been even implicitly involved in any breaches of human rights principles during the reporting period.

LABOUR PRINCIPLES

We are committed to comply with labour legislation and we want to be a good and fair employer.

A competent and committed personnel has been one of the company's main assets through its history and will be in the future. We have identified "Doing things together" as one of the key factors in our strategy and we measure employee satisfaction with annual employee satisfaction surveys. This financial year's employee satisfaction survey has been scheduled to take place in August; thus no survey was conducted on this reporting period.





EMPLOYEES, EMPLOYEE'S RIGHTS AND LABOUR LAW

ASSESSMENT, POLICY AND GOALS

Our goal is to adhere to all local laws and regulations in addition to adhering to the labour principles stated in the Global Compact. As Finnish law is compliant with the labour principles set by the ILO conventions, we believe that our actions fulfil the labour principles to satisfactory levels when operating in Finland. However, we realise that we need to pay attention to recruitment and rights of employees when operating abroad and to our dealings with foreign stakeholders, should the need arise.

IMPLEMENTATION AND OUTCOMES

Our employees have been informed of the labour principles and contents of the ILO conventions, and have been advised to report any breaches of these terms should they come across any. All our employees are covered by the collective agreement. All our employees have contracts of employment adhering to Finnish labour laws. Our recruitment process is designed to prevent any (even unintentional) possibility of breaching the contents of ILO conventions regarding child labour, forced labour or discrimination.

We provide training to our managers in matters related to labour legislation to ensure that we act correctly and in accordance with the laws. We aim to support the knowledge of employees about labour legislation by providing copies of the labour legislation to employee cafeterias.

As a part of our internal purchasing and partner management procedures, we discuss the labour principles with our partners and subcontractors. We provide our smaller partners with feedback, information and our experience that may help them to develop their own practices in relation to labour principles.

Mipro Group has not been involved in any breaches of labour principles during the reporting period.



EQUAL OPPORTUNITIES AND DEVELOPMENT

ASSESSMENT, POLICY AND GOALS

We recognise the importance of a diverse, skilled workforce for our success. We are committed to creating a corporate culture that provides all employees with equal opportunities. We are dedicated to provide our employees with possibilities to develop their skills and knowledge in order to support their work and personal development in different stages of their careers.

IMPLEMENTATION AND OUTCOMES

On this reporting period, we participated in "Father Challenge"¹ that promotes father-friendly working life and fathers' equal right to parental leaves. We want to promote both parents' right to balanced work and family life. Since our employees are predominantly males, the goals of the father-challenge resonate with us. Our practical tools to enhance work-life balance include, for example, parental leave, temporary childcare services in case of child's temporary illness, as well as flexible working hours and remote work arrangements that are available to all employees.

We support our employees in advancing their career, developing their skills and acquiring education. On this reporting period, we have renewed our personal

1 Isä haaste - http://www.isahaaste.fi/

development discussions and policies. In general, the management together with each employee define requirements for skills and knowledge and create individual plans for personal development and education. At the beginning of the employment relationship, a preliminary training plan is drawn up for the employee and it will be complemented during his/ her career when needed.

The group companies participate in the Finnish Government's labour educational program that is designed to provide further education to job seekers and create jobs in the ICT sector². We also cooperate with local universities, colleges and polytechnics by providing their students with internships and practical job placement for thesis work. We employ students directly and also through their educational institutions. In all cases, we provide the students with the same benefits as the other employees and implement the same employment principles.

The outcome of our culture that supports equal opportunities and our support on employees' personal development is perhaps best reflected in the composition of our management - the management group, board of directors and team leaders. Our management includes equally women and men, and people of various educational backgrounds and age.

2 http://www.digitalentakatemia.fi/



OCCUPATIONAL HEALTH

ASSESSMENT, POLICY AND GOALS

Our goal is to adhere to all local occupational health laws and regulations, and we believe that our actions result in a good occupational health environment for our operations in Finland.

The experts we employ are critical for the success of the group; therefore our goal is to minimise the number of sick leaves. We aim to achieve a low level of absences caused by health related issues through preventive actions and policies as well as with an inclusive employee health insurance policy.

IMPLEMENTATION AND OUTCOMES

Finland provides its citizens with wide-ranging public health services which we have complemented with a comprehensive employee health insurance policy that gives our employees access to additional private health services. The policy includes instant access to basic private health services and complementary specialist services such as the services of a physiotherapist and trained professional work supervisors¹. The professional work supervision can assist an employee with professional development or for example help an employee to cope with pressures of the daily work or adapt to changes in working environment.

1 koulutettu työnohjaaja www.suomentyonohjaajat.fi

To improve the availability of occupational health services we arrange visits of occupational health service providers to our office.

Mipro Group companies have implemented preventive policies that aim to ensure a good occupational health. The goal of the Early Support Program² is to identify possible health issues and take any necessary preventive actions as early as possible. We also conduct a semi-annual review of occupational health status with our private health care provider, which is reviewed by the management team of each subsidiary. We realise the importance of employees' own actions and thus we encourage our employees to actively take care of their own health and well-being (TYKY). As in previous years, the group has organised various events for the personnel to promote their health and well-being (TYKY).

The group has healthy, active and relatively young employees and as a result of this and our long-term focus on occupational health issues we have been able to achieve a relatively low number of sick leave days. Our sick leave days per employee ratio is below the industry average in Finland. Furthermore, the number of long-term sick leaves has remained low over the years. For the reporting period, health-related absences have remained at the similar low level as in the previous reporting periods.

2 Varhaisen tuen malli; http://www.ttk.fi/tyoterveyshuolto/tyokyvyn_hallinta



OCCUPATIONAL SAFETY

ASSESSMENT, POLICY AND GOALS

Managing occupational safety is a part of our management system, including controls required by Finnish law, and the ones we have put in place voluntarily. Our goal is simply to ensure the safety, health, well-being and physical ability of all our employees working in and outside the office.

The field we work in requires a multitude of trainings, approvals and certificates regarding safety. Keeping all these up to date on the employee level constitutes an integral part of occupational safety. Some of the required training is rather specific and not directly available; in such cases our goal is to acquire enough expertise in the company itself to be able to train our own employees with regard to occupational safety.

IMPLEMENTATION AND OUTCOMES

Occupational safety is managed by the occupational safety committee which is responsible for and empowered by the management to handle all observations, notices, incidents and improvement suggestions regarding safety, well-being and work environment.

Occupational safety committee members include both employee and management level representatives. The committee works in a yearly cycle which includes creating objectives, planning, implementation and measurement.

Occupational safety is measured by the number of incident-related absence days, "close call" incidents, safety-related deviations, audits of safety equipment usage, reviewing risk management documentation and a facility safety scorecard. The first meeting of the cycle is dedicated to a review of all the results of measurement.

ENVIRONMENTAL PRINCIPLES

ASSESSMENT, POLICY AND GOALS

Mipro Group is committed to take the environment into consideration in all company activities.

Since May 2014 Mipro Oy has operated the Environmental Management System (EMS) certified according to ISO 14001:2015. The system is based on continual reviewing, self-assessment, planning and improvement. It requires us to adopt an active role and a pre-emptive stance in overcoming challenges and our impact on the environment. Furthermore, it encourages us to implement new technologies and practices which are environmentally friendly and sustainable.

The certificate is granted by DNV GL that audits the Environmental Management System on an annual basis.

We apply the following environmental principles to develop our operations and products:

- 1. Our operation policy, products and services meet the requirements of legislation and regulations, and customers.
- 2. We develop our operations and products so as to reduce detrimental environmental impacts.
- 3. We develop products that have a long lifecycle and are maintainable and extendable.
- We extend the lifecycle of the systems we have delivered by means of our own proactive measures. Our organisational structure and operations policy support lifecycle management tasks.
- 5. We track energy consumption and reduce the amount of waste generated by making correct daily choices.
- 6. We reduce the number of business trips by planning them carefully and by using remote meeting applications and remote connections.



Mipro Group operates in the field of environmental technology, and consequently is committed to take the environment into consideration in all company activities.

IMPLEMENTATION AND OUTCOMES

Mipro Oy's implementation of EMS is described in the relevant documents that are part of the company-wide management system. All the roles and responsibilities are assigned, and Mipro Oy's EMS is subject to both internal and external reviews and audits.

In general, there were no incidents with an environmental impact during the reporting period. There were no incidents of non-compliance with environmental regulations and legislation. As such, no corrective actions were required during 2018.

Further, the EMS was subject to an independent external audit in February 2019; two minor environmental non-conformities were identified and corrective actions have been taken. More detailed discussion of outcomes and implementation of our six environmental principles are presented on the following pages.

ENVIRONMENTAL PRINCIPLES

COMPLIANCE WITH LEGISLATION AND REGULATIONS (Principle 1)

In order to be well informed and prepared for possible legislative and regulatory changes, we have a systematic approach to the identification and review of relevant environmental regulation and legislation. There were no incidents of non-compliance with environmental regulatios and legislation; thus, no corrective actions were needed.

DEVELOPMENT (Principle 2)

We strive to make efficient solutions for safe transportation and water management, and continuously develop new and improved solutions for our clients.

During this reporting period, the focus of our environmental campaign was to find new ways to reduce our environmental impacts. The idea competition called for good ideas on how we could enhance our products or our operations to reduce environmental impacts, and how our products could be more resilient for climate change. The ideas will be taken into action during future reporting periods.

LIFECYCLE MANAGEMENT (Principles 3, 4)

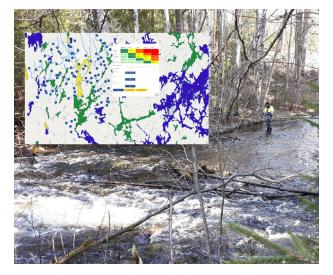
Mipro Group companies provide solutions with long lifecycles. The aim is to provide our clients with the best possible long-term yield on their investments in our solutions. Furthermore, we provide lifecycle management services to sustain the value of the investment and as long a lifecycle as possible.

Our goal is to take environmental aspects into account in all the various phases of our solutions' lifecycle.

Our subcontractors and cooperation partners are mainly Finnish and operate according to the relatively strict Finnish environmental laws and instructions. We are interested whether our suppliers have an environmental certificate and we perform supplier audits and follow up the results of audits very carefully.

We monitor and manage the environmental load caused by our own actions by means of the environmental system; for example, we have specified our own daily operations for site instructions.

We dispose discarded equipment, including our own equipment and customers' equipment returning to us – for example in connection with service and upgrade – in a responsible manner, paying attention to information security and environmental aspects. We deliver electronic waste to an ISO 14001 certified company for disposal. We draw up and supply recycling instructions for imported equipment.



Mipro Group has developed tools for the management of environmental safety to facilitate water protection and improve water quality. The digital tool is based on the Mipro REGO situation awareness system that collects real-time situational information about the environment and risks.

ENERGY CONSUMPTION AND WASTE (Principle 5)

In our own operations, office waste, emissions from transportation and energy consumption have been identified as our most significant sources of environmental impact.

To reduce the environmental impact, we monitor the company's energy use and emissions. We have completed our site instructions with environmental aspects, for example by including a number of diverse environmental measurements, such as carbon dioxide emissions, on the site. We have also brought up environmental aspects in supplier audits.

Mipro encourages personnel to perform practical environmental actions in accordance with the principle that even the smallest act is of great significance for the environment. In December we encouraged our employees to participate in "Kinkkutemppu⁴¹ campaign." The campaign collects household cooking fats and turns this holidayseason food waste into biofuel.

REDUCE BUSINESS TRIPS (Principle 6)

We strive to use video conferences and VoIP sessions for internal and external communication whenever possible. We have invested in video conference equipment and connections and made relevant arrangements inside the company and between different offices and with important customers. Our goal is to improve communication and reduce business trips at the same time.

On average, employees use VoIP and instant messaging tools two to three times per day and on average they participate in or host two remote meetings each week.

FAIR BUSINESS PRACTICES

Reliability and responsibility have always been an integral part of Mipro Group's vision and are consequently reflected in our day-to-day operations and activities. Legal compliance, business ethics, trustworthiness and responsibility are important values for us.

We require all our partners and subcontractors to fulfil their statutory obligations. Partners and

subcontractors must provide information regarding proper insurance coverage, fulfilment of their statutory tax obligations and statutory filings for example.

As part of our internal purchasing and partner management procedures we check that such information is up-to date and available from all our subcontractors and partners.

ANTI-CORRUPTION PRINCIPLES

ASSESSMENT, POLICY AND GOALS

As a company primarily based in Finland, corruption and bribery have traditionally been exempt from the business environment. However, we realise that corruption appears in many forms outside the exact letter of the law and these can be hard to identify.

During interactions with officials and customers there may be many borderline, seemingly legal and silently accepted practices that are not in line with the principle of upholding a transparent and fair business environment. Our goal is to refrain from any such activities and encourage our stakeholders to do so as well through our example.

IMPLEMENTATION AND OUTCOMES

In our guidance and internal material, we outline what corruption (in all its forms) constitutes, and we inform our employees periodically against partaking in any form of corruption or bribery.

They are also instructed to report on any evidence of corruption they come in contact with. To emphasise the importance of upright dealings, the group has given instructions and principles, and provided personnel with instructions concerning corporate gifts. In addition, our financial duties are separated, preventing individual employees from accessing company funds for unauthorised actions.

We have not identified any cases of corruption or bribery within our sphere of influence during the reporting period.

We have not identified any cases of corruption or bribery within our sphere of influence during the reporting period.

SAFETY AND QUALITY MANAGEMENT

ASSESSMENT, POLICY AND GOALS

Safety and quality of our products and services are of outmost importance for us. We deliver systems that guard the safety, efficiency, and availability of water supply and mass transport, hence our actions have a direct impact on the safety and well-being of the people and environment in the communities we serve. Our greatest responsibility rests on fulfilment of this safety commitment and promise that we have made to our customers and to the communities and people who are using this infrastructure in their daily lives.

Our goal is to deliver the most reliable safety systems and services. We follow several voluntary and legally required standards to ensure quality of our operations and reliability of the safety systems we deliver. Our operations are regularly audited by external parties to ensure the correct application of these standards and to find areas of improvement.

The ISO 9001:2015¹ and ISO 14001:2015² standards cover all major operative companies in Mipro Group. Thus, during the reporting period Group's total revenue is generated by companies having ISO certified operations. EN standards are applied to all rail traffic products and projects; each safety related product and project is assessed by an independent safety assessor.

IMPLEMENTATION AND OUTCOMES

How the Mipro Group companies implement ISO and EN standards is described in relevant internal documents which are part of the company-wide management system. All employees are required to familiarise themselves with the management system documents that are relevant to their work and position and to follow the procedures of the management system. Each employee has the responsibility and right to intervene, if the guidance of the management system and the common procedures are not followed.

Compliance is audited internally and by independent auditors and occasionally by our customers. DNV GL audited our ISO 9001:2015 Integrated Management System and 14001:2015 Environmental Management System on February 2019. No major non-conformities were found in the audit.

Common mechanisms of continual improvement – such as idea and risk management processes and the process for assessing and preventing non-conformities – are actively used to identify areas for development and to improve our products, services and quality of operations; employees' initiatives and active participation in continual improvements are encouraged. Possible deviations and non-conformities are openly and transparently assessed within the company and with our external auditors and customers as needed.

² ISO 14001:2015; certification in accordance with the new version of the standard in 2016. Audited by DNA at 9-month intervals



¹ Certification in accordance with the new version of the standard in 2016; audited by DNV at 9-month intervals

IMPLEMENTATION AND OUTCOMES

We recognise that continuous improvements in safety and quality management are needed and we believe that this will be critical to our success in years to come. To reach our goals and to deliver the most reliable safety systems, we need to ensure continuous efforts to develop our quality and safety management systems and culture as well as the skills and knowledge of our employees.

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Our operation and products are based on quality and safety standards:

- Integrated Management System ISO 9001
- Environmental Management System ISO 14001
- Functional Safety Management IEC 61508
- Railway projects EN 50126, EN 50128, EN 50129
- Process industry projects IEC 61511
- System components and software DIN V VDE 19250, IEC 61508, EN 954-1

DEVELOPING THE LOCAL COMMUNITY

Mipro Group participates in the development of our local communities by cooperating with educational and other institutions. We cooperate with local colleges, universities and polytechnics by offering their students summer and training jobs on a yearly basis. Our long-term goal-directed principle is to offer local young people possibilities to find permanent jobs in their own region as well.

DONATIONS AND CHARITY

Mipro Group supports local sport activities and especially children's and young people's leisure time activities by giving donations. The main principle of donations for leisure time activities is to support sport and culture clubs and societies so that they are able to provide hobbies and interests for as many children and young people as possible, and support their growth and development. For example, they can strengthen social relationships, promote health, create inspiring environments or prevent young people from becoming socially isolated.

Each year the company selects a charity for its Christmas donation which this year was the HOPE ry¹. HOPE is a non-profit organisation with a goal to ensure more equal everyday life to all children in Finland. The organisation donates clothing and supplies to low-income families and families with immediate need. Further, the organisation supports hobbies and leisure time experiences for children and adolescences.

¹https://hopeyhdistys.fi/

At Mipro Group, we have always been concerned about doing the things we do for the community. Operating in the field of functional and environmental safety, we understand our responsibility and impact on providing safe and functional solutions for mass transportation and providing clean water.

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