

## MODEL DOCUMENT FOR ETHICAL PRINCIPLES OF BUSINESS OPERATIONS

This model document outlines certain principles of business ethics and related practices and policies. Commitment and adherence to these principles and practices is likely to promote good corporate citizenship and help companies to conduct ethically sustainable business. Adherence to such principles helps companies treat their employees, contract partners and other interest groups not only in accordance with law but also in accordance with good business practice.

This model document is designed to provide a list of recommended principles recommended for business operations and business relations in Finland. If the company has international operations, these principles should be supplemented to the extent necessary by taking into consideration for example the differences between the laws of different countries and issues relating to international subcontracting chains.

The ethical principles must be observed and compliance with them must be monitored comprehensively at all operational levels of the organisation and must apply to all employees.

Many companies apply their own ethical standards in their businesses. The purpose of this model document is not to replace such standards but only to provide a model for companies drafting their own ethical standards and to encourage companies in developing and introducing ethical principles for their own operations that take into account the respective company's individual needs.

The set of ethical principles included in this model document is not exhaustive. Ethical principles and the related practices and guidelines must be developed and specified on an ongoing basis to ensure that they are in line with the company's values and the requirements of the company's operating environment.

**This model document is not intended to be attached to a contract document.**

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## OUR ETHICAL BUSINESS PRINCIPLES

### Corporate Governance

We follow the development of corporate governance practices and apply them in our own operations to the relevant extent. We pay special attention to supervision and reporting practices to ensure that our operations are lawful and that we comply with these principles.

### Good Business Practice

We do not violate good business practice or use practices that are otherwise unfair to other entrepreneurs. We promote ethical practices in our business relations.

The commercial purpose of our marketing must clearly appear from the marketing. We observe generally accepted principles in our marketing.

We respect other cultures.

Our business relations with our partners are determined on a commercial basis.

### Anti-Bribery and Corruption

Bribery and other forms of corruption are prohibited in our operations.

We will contribute to a society in which there is a high level of confidence in companies, enterprise, the market economy and the rule of law. Therefore, we take active measures to combat any form of bribery and corruption that can affect our business relations.

### Safe Working Environment and Wellbeing at Work

We offer a safe and positive workplace for our employees. We actively promote the health, job satisfaction and personal development of our employees. This is why we ensure that our employees have a work environment and working conditions that prevent hazards to physical and mental health and that promote job satisfaction and personal development. This encompasses management practices, workplace design, equipment, practices, job descriptions, opportunities for personal development and all other aspects of the work environment.

We have zero tolerance with regard to all forms of physical or verbal harassment. We will take active measures against all occurrences of harassment.

We monitor workload. Where necessary, we take action to ensure that work is distributed more evenly or workload is decreased.

### **Equal Treatment of Employees**

We treat our employees equally unless there is an acceptable cause for derogation deriving from the duties and position of the employees.

We do not tolerate discrimination and work proactively to combat all forms of discrimination in terms of, for example, wage formation and career development. We introduce appropriate processes to identify and deal with all cases of discrimination.

### **Prohibition of Child Labour**

We do not tolerate the use of child labour or forced labour. We do not tolerate the economical exploitation of children in any form.

### **Respect of Intellectual Property Rights**

We comply with and respect all applicable laws and regulations as well as international conventions and treaties relating to the protection of intellectual property rights, such as copyrights, patents, trade marks and designs. We will always respect the intellectual property rights of others and make sure that we do not violate the protected rights or business secrets of other parties or exploit them without authorisation when developing, manufacturing and delivering our products and services and when using third party products or services that are protected by intellectual property rights.

### **Environment**

We actively contribute to sustainable development by taking the environment into account in all aspects of our business. We comply with the applicable environmental laws and regulations in our business. We aim to use natural resources sparingly.

In our contacts with our customers and partners, we intend to highlight the environmental benefit provided by our products and services. We welcome all forms of initiative from our employees, customers and partners that will help us to reduce the adverse environmental impact of our business.