

CODE OF CONDUCT

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Terms explained

Bribery	<i>The offering, promising, giving, accepting, or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements may be direct or indirect and can take the form of money, gifts, loans, fees, rewards, or other advantages (taxes, services, donations, favours etc.)</i>
Compliance	<i>Conforming or adapting one's actions to a rule or to necessity.</i>
Corruption	<i>The abuse of entrusted power for private benefit. Actions that jeopardize the integrity and fairness of professional duties by using bribery or corrupt practices.</i>
Governance	<i>The act, process or power of exercising authority or control in an organizational setting.</i>
Inside information	<i>A fact about a publicly listed company's plans or finances that has not yet been revealed to shareholders or other stakeholders and that could give an unfair advantage to its possessors if acted upon.</i>
Intellectual capital	<i>The value of a company's employee knowledge, skills, business training etc.</i>
Intellectual property rights	<i>The rights given to persons or companies over the creations of their minds. They usually give the creator an exclusive right over the use of their creation for a certain period.</i>
Statute	<i>A written law passed by a legislative body, a rule of an organization or institution.</i>
Sustainability	<i>Meeting the needs of the present without compromising the ability of future generations to meet their own needs. In practice, sustainability means making choices and taking actions that protect natural ecosystems, support social well-being, and promote responsible economic growth, so that people and the planet can thrive both now and in the future.</i>
Whistleblower	<i>Any person who reports suspected misconduct, concern or violation.</i>
WhistleB	<i>Sitowise's confidential whistleblowing channel that can be used to report concerns anonymously, both internally and externally.</i>



Sustainability and ethical principles at the core of daily work

Sustainability is one of the three main pillars of Sitowise's strategy. We want to be a driver of change: we promote sustainability broadly across our operating environment and ensure that our own operations follow the same principles. Our work is founded on our values — we trust one another, understand our clients, act with courage, play as one team, and are open — which guide our decisions and lead us toward more sustainable solutions.

What is Code of Conduct?

Code of Conduct describes how we run our business in a sustainable and ethical manner. It guides our actions to achieve optimal outcomes collaboratively with employees, partners, and clients. Code of Conduct provides practical instructions to implement the principles in daily work.

The Code of Conduct underlines our commitment to comply with legislation and other regulations applicable to us in all the countries where we operate. The criteria in this Code of Conduct are based on UN Global Compact that are related to human rights, labour, environment and anti-corruption activities, ILO Declaration on Fundamental Principles and Rights at Work and OECD Guidelines for Multinational Enterprises.

Who is concerned?

Sustainable and ethical manners concern everybody. This Code of Conduct applies to members of the board, management, all employees, and activities of Sitowise and its subsidiaries. We require our partners to adhere to sustainable practices, and expect suppliers and subcontractors to comply with our Code of Conduct.

This document is publicly available on our website and all employees are required to complete a mandatory Code of Conduct training.

Act if you have concerns or suspect violations

We want to ensure that our Code of Conduct is followed, and any concerns or violations are reported promptly. Employees should contact their supervisor, and clients or stakeholders their contact person at Sitowise. EVP, People and Culture or the CFO may also be contacted directly.

If it is not possible to share information openly, Sitowise has a whistleblowing channel that can be used anonymously.

Heikki Haasmaa
CEO
Sitowise Group Oyj



We comply with laws and our commitments

Compliance with the statutes that are binding on us is the starting point for all our operations. In addition, we adhere to good governance in our operations, as well as universally recognized business principles and other appropriate regulation in the industry.

Sitowise employees are required to familiarize themselves with the legislation, commitments, and internal guidelines applicable to their duties and Sitowise, and to act accordingly.

Special requirements applicable to Sitowise as a publicly listed company

We do not use inside information to gain economic benefits, either personally, through closely associated persons, or through third parties.

All employees must assess whether the information they possess is inside information in any situation. This obligation applies in every situation - whether the person is on the insider list or receives information from other sources. When receiving important information, an individual should always actively consider whether the information on display is insider information.

Further information on insider information matters is available in Sitowise's Insider Guidelines available at: www.sitowise.com/investors/governance/insider-management

The principles of the company's investor communications are openness, activity, reliability, transparency, and fairness. The company communicates clearly and consistently on both positive and negative issues.

Sitowise's Disclosure policy can be found in the following address:
www.sitowise.com/investors/disclosure-policy

Other externally published policies related to Sitowise way of working can be found in the following address: www.sitowise.com/sustainability

The way we operate

In an individual case, we consider our policy options through these questions:

- Is my action legal?
- Is my action correct and appropriate?
- Is my action consistent with Sitowise values and objectives?
- Is my action consistent with our stakeholders' expectations?
- Is the information I have inside information?
- Is it certain that I, or persons closely associated with me, are not using inside information when buying or selling Sitowise shares?
- Is it certain that I am not disclosing any inside information?



We care about people and our working community

Sitowise respects, supports and commits to human rights and equality according to all local laws and regulations. Sitowise is committed to respecting key human rights conventions, including the UN Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. These conventions are integral to our operations, and we actively reflect their principles in our practices.

In alignment with the ILO principles, we are committed to respect freedom of association, the right to collective bargaining, and the rights to be free from forced labor, child labor, and discrimination in employment and occupation. Additionally, we adhere to the UN Global Compact and its ten principles (attached in this Code of Conduct).

We do not accept any form of violence, abuse, bullying or harassment. We do not accept discrimination based on gender, nationality or ethnicity, age, religion, sexual orientation, psychological or physical characteristic or impairment, political or other views, social status, family relationships or other personal features.

We always operate according to good safety practices. Our goal is a zero-accident working community. We take care of the necessary safety training of our experts and regular repetition and development of the training sessions.

Intellectual capital and expertise of our skilled staff is the most important asset of Sitowise. We promote the wellbeing of our employees by ensuring their coping at work and safety and by investing in job satisfaction. We fulfil our employer responsibilities and strive to be a reputable and trustworthy employer. We respect employees' freedom of association and the legal principles of pay.

We do not accept human rights violations in our own activities, in our supply chain or in the activities of our partners. Sitowise is committed to support providing remedies in human rights violations cases where significant negative impact has been caused or contributed by the company. EVP, People and Culture and the CFO are jointly due to their areas of responsibility in charge of human rights compliance at Sitowise, concerning personnel and the value chain.

The way we operate

- We treat our colleagues appropriately and equally.
- We do not accept any form of discrimination.
- We will intervene in the discrimination or harassment we perceive.
- We always operate in accordance with good safety practices, including for example familiarizing ourselves with the required instructions before entering a site or terrain.
- We immediately intervene in any work safety deficiency or substance abuse situation that we detect.
- We base recruitment decisions on objective criteria.
- We support our colleagues based on our own skills.



We develop a sustainable and smart environment

We develop sustainable and smart living environment in cooperation with our clients and partners. Through our customer projects, we have significant opportunities to influence the sustainability impacts of our operating environment. We aim to influence the whole sector to strive for more sustainable communities. We are constantly developing sustainable, environmentally friendly and smart services and strive to minimize the adverse environmental impact of our services.

We have identified the sustainability aspects of our own activities and set out objectives that we regularly follow. We strive to minimize our own adverse environmental and social impact.

We expect our partners to pursue a similar level of sustainability in their own activities.

We help to build sustainable society and operate together with local communities and other relevant stakeholders, listening to and respecting their views. We aim to be the most responsible partner in developing a prosperous living environment.

The way we operate

- We actively encourage our clients to promote alternatives optimized from climate, nature and resource points of view.
- We assess the environmental sustainability of our projects with our sustainability tool in a broad context and we are looking for ways to maximize our positive sustainability impacts.
- We actively engage partners and clients in developing new, environmentally sustainable services and smart solutions.
- We are reducing our carbon dioxide emissions in line with science-based targets
- We avoid unnecessary travel and for example, use online meetings also for environmental reasons.
- We use shared and environmentally friendly forms of mobility in business travel.
- We act responsibly in material consumption and waste recycling.



We take care of assets and information

We take care of assets that are our own or under our responsibility, and we only use them for our business. As an expert organization, information is one of the most significant assets of Sitowise, and we therefore pay special attention to the processing and protection of confidential information.

We adopt technological changes in a controlled manner, ensuring the quality, completeness, and integrity of the information provided for our clients.

We consider the regulatory requirements for security as the minimum level for our operations.

We process personal data with special care.

The way we operate

We process and store the information in our possession in line with the provided instructions and solely for the purposes for which it was disclosed to us.

We take care of access controls to ensure the security of confidential information.

We use the endpoints, such as laptops and mobile devices, assigned to us in accordance with Sitowise security guidelines.

We respect and protect the intellectual property rights of our clients, partners, and ourselves.

We do not discuss confidential matters publicly, and we do not talk about clients in an identifiable way in the presence of outsiders without the consent of the client.

When working with AI, we follow the four core principles: respect for human autonomy, prevention of harm, fairness, and transparency and explainability.



We procure responsibly

Sitowise's procurement consists of partnerships and subcontracting related to customer projects, project purchases, and purchases of other goods and services. We conduct all our purchases responsibly, in accordance with established procurement practices.

We operate fairly and transparently with our contractual partners. Reliable partners are an effective part of success in business. That is why the sustainable operations of our contractual partners are also important to us. We value our partners and build transparently sustainable partnerships. We consider the social and environmental aspects of sustainability in the selection of partners. We require our contractual partners to comply with legislation and to observe the key principles of our Code of Conduct. We also expect commitment to ethical and sustainability principles in suppliers' own procurement chains.

In our operations, the aim is always to advance the goals that have been set together. Therefore, we avoid situations where someone's private interest conflicts with the interests of Sitowise. Personal relationships do not affect our decision-making in procurement, and decision-making does not retain personal benefits, but decisions are always taken in the best interests of the client and Sitowise.

The way we operate

- We implement tendering processes in a transparent manner and based on pre-established selection criteria.
- We want to know our contractual partners, and therefore require proof of their background and business record.
- We treat our potential and current partners equally.
- We always act in the interests of Sitowise and our clients.
- In case of any conflict of interest, we will openly bring it up.



We do not accept corruption, bribery, extortion, or anti-competitive actions

Corruption is an activity that aims to influence business or decision-making inappropriately and to the unjustified benefit of any party. Sitowise has zero tolerance for corruption or bribery in all its forms. We never pay, offer, solicit, request, or accept bribes or any other undue advantage. This includes not only direct exchanges but also indirect promises, gestures, or facilitation payments that could be seen as influencing a decision improperly. We continuously monitor our business activities to detect and prevent corruption risks. We also report suspected money laundering and terrorism financing activities promptly to authorities.

It is important for us to meet, listen and interact with our clients and partners. We act diligently when offering or receiving hospitality or gifts. Only reasonable and customary hospitality or gifts are acceptable. We never give or receive cash or cash equivalent as a gift.

We respect our competitors and promote fair competition by adhering to agreed procedures and by acting honestly in our offers. We act in accordance with all applicable competition laws and our internal competition guidance, and provide training on competition matters to our employees.

The way we operate

- We can only give or receive reasonable and customary gifts or hospitality. We respect similar rules of our clients and partners.
- If the gift or hospitality offered seems doubtful or questionable, we will discuss this with our supervisor in advance.
- When offering hospitality, we record the participants' names and the basis for the expense.
- When giving and receiving gifts, we take ethics and sustainability into consideration.
- We decide the causes of donations and sponsoring according to our sponsor and donation policy.
- We do not financially support political or religious activity.
- We do not engage in agreements or conduct that illegally restrict competition and always act independently and in compliance with competition laws.



Reporting concerns and violations

We want to ensure that our Code of Conduct is followed, and any concerns and violations are reported. This is how we adhere to our commitment to act responsibly. Violating the Code of Conduct undermines our brand and stakeholders' trust and creates significant business, personal and societal risks.

Each of our employees and partners must immediately report any concerns and known or suspected inappropriate behavior.

- We request the staff to report their concerns and to tell their suspicions primarily to their supervisor. If this is not possible, EVP, People and Culture or the CFO can also be contacted.
- We request the partners to primarily contact their designated contact person at Sitowise. If this is not possible, EVP, People and Culture or the CFO can also be contacted.
- When normal reporting procedure is felt to be inadequate, it is also possible to send a message via our confidential whistleblowing channel. We encourage you to make the notification under your own name, but it is also possible to make it anonymously.
- Whistleblowing process is compliant with the EU-wide standard for the protection of whistleblowers adopted as directive for whistleblower protection in December 2019 and implemented into national laws in EU member states.

The way we operate

Our whistleblowing channel is WhistleB, and a link to the channel can be found on our website and intranet. The contacts lodged there will be promptly and confidentially processed by EVP, People and Culture or Legal Counsel. Sitowise has zero-tolerance of retaliation against whistleblowers.

Sitowise considers all received messages and takes appropriate action based on them. Violating the principles of our Code of Conduct will result in an appropriate sanction. If the violation involves illegal activities, we will assist the authorities in resolving the matter and take the necessary legal action.



Appendix 1. The Ten Principles of the UN Global Compact

The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

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.

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.

