

**SITOWISE**

# **CODE OF CONDUCT**





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# 1 We are an active and reliable social player



We are an important player in our industry, thus we have an important role to play as a social influencer and industry developer. In line with our corporate responsibility vision, we want to be the most responsible partner in the development of a prosperous living environment. We build society together with local communities and other relevant stakeholders, listening to and respecting their views.

Acting in a responsible manner is one of the cornerstones of our strategy and an essential part of our decision-making. To achieve our vision, responsibility is an essential part of our choices and design solutions. We take daily steps towards our goals and monitor their implementation.

This Code of Conduct describes how we run our business in a responsible and ethical manner, and our commitment to comply with legislation and other regulations applicable to us in all the countries where we operate. We wanted to make our Code of Conduct public so that all interested stakeholders may familiarise themselves with our principles of responsible and ethical business.

This guideline applies to all boards of directors, employees, units and activities of Sitowise and its subsidiaries. We also require responsible practices from our partners. This guideline provides practical instructions to support the implementation of our principles in daily work. The guideline will be part of our employment and partnership contracts as well as the training and orientation of staff. In cases of doubt or requiring clarification of the Code of Conduct, our employees can contact their own supervisor or the Manager of Responsibility, and our partners can contact their contact person or the Manager of Responsibility at Sitowise. We also have a confidential whistleblowing channel.

In addition to the Code of Conduct, our other defined policies and principles as well as guidelines targeted at staff guide our responsible practices. In addition, Sitowise has a goal-oriented responsibility programme that describes the strategic priorities of responsibility and gives direction to the measures that support them.

Responsible and ethical operations are our common duty. Together with our staff, partners and customers, we will achieve the best results.

This Code of Conduct is available at [www.sitowise.com](http://www.sitowise.com).

In Espoo, 1 March 2020

**Pekka Eloholma**  
CEO  
Sitowise Oy



## 2 We comply with laws and our commitments

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

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



### 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?



### 3 We care about people and our working community

We respect and support human rights and equality. We adhere to the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We do not accept the use of child labour or any form of forced labour.

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 impairment, political or other views, social status, family relationships or other personal features.

Safety is of utmost importance to Sitowise. 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.

We fulfil all our employer responsibilities and we want to be a reputable and trustworthy employer. We respect employees' freedom of association and the legal principles of pay. Skilled staff is the most important asset of Sitowise, and a prosperous expert is one of the three top themes of our responsibility effort. We promote the wellbeing of our employees by ensuring their coping at work and safety and by investing in job satisfaction. We expect the same principles to also guide our partners' operations.



#### THE WAY WE OPERATE

- We treat our colleagues appropriately and equally.
- We will intervene in the discrimination or harassment we perceive.
- We always operate in accordance with good safety practices and familiarise 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 according to our own skills.



## 4 We develop a sustainable and smart environment

We develop a sustainable and smart living environment in cooperation with our customers and partners. The most significant vehicle to enhance the environment is through projects' climate and resource-wise solutions. We are constantly developing our sustainable and environmentally friendly services and strive to minimise the adverse environmental impact of our services.

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

We expect our partners to undertake to pursue a similar level of environmental responsibility in their own activities.



### THE WAY WE OPERATE

- We actively encourage our customers to promote climate and resource-wise alternatives.
- We assess the environmental responsibility of our projects in a broad context and are looking for ways to reduce negative environmental impacts.
- We actively engage partners and customers in developing new, environmentally responsible services and solutions.
- We avoid unnecessary travel and we save the environment, for example, by online meetings.
- We take advantage of shared and environmentally friendly forms of mobility in business travel.
- We act responsibly in material consumption and waste recycling.



## 5 We take care of the assets and information under our responsibility

We take care of assets that are our own or under our responsibility, and we only use them for our business. As an expert organisation, information is one of the most significant assets of Sitowise, and we therefore pay special attention to the processing and protection of confidential information. The quality, completeness and integrity of the information provided for our customers will be ensured.

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 accordance with the instructions provided and only for the purpose for which they were disclosed to us.
- We use the telephone, computer and other terminals assigned to us in accordance with Sitowise security guidelines.
- We take care of our intellectual property rights and access and do not share them with others.
- We do not discuss confidential matters publicly, and we do not talk about customers in an identifiable way in the presence of outsiders without the consent of the customer.



## 6 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 responsible 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 responsibility in the selection of partners. We require our contractual partners to comply with legislation and to observe the key principles of this code of conduct. We also expect the same commitment in their own procurement chains.

The starting point of our operations is to promote our common goals. 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 customer 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 thus requiring proof of their background and business record.
- We monitor a partner's responsibility during the contract period, even after procurement.
- We treat our potential and current partners equally.
- We promote fair competition by adhering to agreed procurement procedures and by acting honestly in our offers.
- We always act in the interests of Sitowise and our clients.
- In case of any conflict of interest, we will openly bring it up.





## 7 We do not accept corruption or bribery

Corruption is 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 forms of it. We never pay, offer, solicit, request or accept bribes or any other undue advantage.

It's important for us to meet, listen and interact with our customers and partners. Only reasonable and customary hospitality or gifts are acceptable. We never offer money or anything comparable to it as a gift. We never give or receive cash or cash equivalent as a gift.

We respect our competitors and want to promote fair competition.



### 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.
- Our gifts are in accordance with our responsible operations.
- We decide the policies and targets of donations yearly.
- We do not economically support political or ideological activity.



## 8 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 behaviour.

- We request the staff to report their concerns and to tell their suspicions primarily to their supervisor. If this is not possible, the Manager of Responsibility can also be contacted.
- We request the partners to primarily contact their designated contact person at Sitowise. If this is not possible, the Manager of Responsibility can also be contacted.
- 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.



Our whistleblowing channel is **WhistleB**, and a link to the channel can be found on our website. The contacts lodged there will be promptly and confidentially processed by the Manager of Responsibility and the Manager of Human Resources.

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.





**SITOWISE**