

CODE OF CONDUCT

Updated in January 2022

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Our vision: The most responsible partner in developing a prosperous living environment

Sustainability is the cornerstone of Sitowise's strategy and an essential part of our decision-making.

In our sustainability program 2025 we have set four goals:

- We are carbon neutral in 2025
- We are the most equal workplace with best employee wellbeing in the industry
- We aim for sustainable economic growth
- We actively contribute to making our industry more sustainable

Our Code of Conduct describes how we run our business in a sustainable and ethical manner. We underline our commitment to comply with legislation and other regulations applicable to us in all the countries where we operate.

Code of Conduct provides practical instructions to support the implementation of our principles in daily work. Sustainability is the most important factor in everyday choices we make – both in projects and inside our work community.

Sustainable and ethical way of working is our common duty. Together with our employees, partners, and clients, we achieve the best results.

Code of Conduct is part of our employment contracts as well as the training and orientation of all new employees.

We want to ensure that our Code of Conduct is followed, and any concerns or violations are reported. In suspected cases, we encourage contacting us as soon as possible. For our employees, the primary contact person is own supervisor. For our clients and representatives of other stakeholders, contact person is liaison at Sitowise. It is always possible to also contact the Chief Sustainability Officer at Sitowise.

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

This guideline applies to members of the board, all employees, and activities of Sitowise and its subsidiaries. We also require sustainable practices from our partners.

Our Code of Conduct is a public document so we can openly show our commitment to principles of sustainable and ethical business.

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 of 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.

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.

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

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, individual should always actively consider whether the information on display is insider information.

Sitowise Disclosure policy can be found in the following address:

www.sitowise.com/investors/disclosure-policy

Insider Guidelines are also available on the webpages:

www.sitowise.com/investors/governance/insider-management

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 insider 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

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. In our Sustainability Program 2025 we have committed to join UN Global Compact and its 10 principles (attached in this Code of Conduct), the world's largest corporate sustainability initiatives. We do not accept the use of human rights violations in our own activities, in our supply chain or in the activities of our partners or suppliers.

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.

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.

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 expect the same principles to also guide our partners' and suppliers' operations.

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 and familiarize 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.



We develop a sustainable and smart environment

We develop a sustainable and smart living environment in cooperation with our clients and partners. The most significant tools to enhance the environmental impacts of our work come through projects, and the climate and resource-wise smart solutions Sitowise experts do. We are constantly developing our sustainable and environmentally friendly and smart services and strive to minimize the adverse environmental impact of our services.

We aim to influence the whole industry to strive for more sustainable communities. We have an important role as a social influencer and industry developer.

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

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

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

The way we operate

- We actively encourage our clients to promote climate and resource-wise alternatives.
- 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 sustainability impacts.
- We actively engage partners and clients in developing new, environmentally sustainable services and smart solutions.
- We avoid unnecessary travel and for example, use online meetings also from environmental reasons.
- We take advantage of shared and environmentally friendly forms of mobility in business travel.
- We act responsibly in material consumption and waste recycling.
- We aim to be carbon neutral in our own operations



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. The quality, completeness and integrity of the information provided for our clients 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 take care of access controls so that the confidential information is secured.
- We use the mobile phone, computer and other terminals assigned to us in accordance with Sitowise security guidelines.
- We respect and take care of clients, partners, and our own intellectual property rights.
- 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.



We procure responsibly

Sitowise's procurement consists of partnerships and subcontracting related to client 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 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 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 thus requiring proof of their background and business record.
- We monitor partners' sustainability 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.



We do not accept corruption, bribery, or extortion

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 its forms. We never pay, offer, solicit, request, or accept bribes or any other undue advantage. We report suspected money laundering and terrorism financing activities promptly to authorities.

It is important to 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 procurement procedures and by acting honestly in our offers.

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 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.



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, Head of Human Resources or Head of Sustainability can also be contacted.
- We request the partners to primarily contact their designated contact person at Sitowise. If this is not possible, Head of Sustainability 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 Head of Human Resources or Head of Sustainability.

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.



Appendix 2.

Important terms explained

Bribery

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 can take the form of money, gifts, loans, fees, rewards, or other advantages (taxes, services, donations, favours etc.)

Compliance

Conforming or adapting one's actions to a rule or to necessity.

Corruption

The abuse of entrusted power for private benefit. Perversion or destruction of integrity in the discharge of duties by bribery or favor or the use or existence of corrupt practices.

Governance

The act, process or power of exercising authority or control in an organizational setting.

Inside information

A fact about a public 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.

Intellectual capital

The value of a company's employee knowledge, skills, business training etc.

Intellectual property rights

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 his/her creation for a certain period.

Statute

A written law passed by a legislative body, a rule of an organization or institution.

Sustainability

Generally, referring to a process or operating model that can be maintained over an indefinite period of time. Commonly used with development as in: "Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs".

Whistleblower

Any person who reports suspected misconduct, concern or violation.



WhistleB

Sitowise's confidential whistleblowing channel that can be used to report concerns anonymously, both internally and externally.

