

Code of Conduct

Cinia Oy

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Introduction

Ensuring responsibility is an important part of our everyday operations. This Code of Conduct outlines the responsible and acceptable practices of Cinia Ltd and its group companies. The Code of Conduct applies to all employees, leased employees, subcontractors and other partners. All of the above mentioned persons are obligated to read this document and comply with it. The Code of Conduct helps us to act appropriately and to identify situations that should be assessed more thoroughly.

Cinia's Board of Directors has approved and the Code of Conduct on 21 March 2018 and the updated versions or for on 25 October 2018 and 25 October 2019 and 20 November 2020.

1. We comply with laws in our operations

We comply with all applicable laws and regulations in our operations. Cinia screens the economic sanctions when onboarding new suppliers or customers.

2. We condemn bribery in any form

We condemn bribery in any form. Bribery is defined as request, offer or receipt of any gift, loan, payment, reward or other advantage of more than modest value that exceeds hospitality as a normal business practice, when the intention is to influence the decision-making of Cinia or its business partners or when it might endanger Cinia's reputation or the general trust in our operations.

We do not offer or accept any hospitality or gifts, which might influence decision-making related to our business relationships or which could be considered to exceed normal hospitality.

Ordinary business gifts, courtesy and reasonable hospitality are allowed as they are part of normal business practice and interaction between customers and business partners.

Particular attention and care should be paid to situations where business decisions are being prepared.

When offering hospitality to authorities, we must ensure that the offered advantage complies with the guidelines issued to authorities on the receipt of hospitality and the special legislation applied to officials.

Cinia has prepared detailed anti-bribery principles that are part of Cinia's Code of Conduct.

3. We identify and prevent conflicts of interests

A conflict of interest refers to a situation where the actual or sought personal interests of a person involved in decision-making or its preparation threatens impartiality. We ensure that conflicts of interest do not influence decision-making and take special care in situations where something might threaten the impartiality of decision-making.

We always act in the interest of Cinia, not personal gain.

Various situations may create a conflict of interest. For example, a Cinia employee might have a personal relationship or another interest in a company that cooperates with Cinia.

If a conflict of interest exists, the person involved is not allowed to prepare or present the issue in question or to participate in the related decision-making.

Cinia's guidelines on related parties are applied to identify and prevent conflicts of interest.

4. We act fairly and openly

Our relationships with customers, partners and other stakeholders are based on integrity and trust. We maintain business ethics in all our operations. All business transactions where Cinia is involved are transparent in structure and financially sound.

We promote fair competition and always comply with competition laws. All agreements that restrict competition and may violate competition laws (agreements on prices, agreements that restrict competition by markets or customers, sharing of markets, sharing or distortion of tendering processes) are forbidden.

We do not discuss competition-related matters with our competitors or agree on prices or terms of sale.

5. We protect the environment

We consider environmental aspects in all business decisions. In 2016, Cinia introduced a new management model for sustainable development. It is based on UN Sustainable Development Goals.

Cinia operates in a business field, in which environmental responsibility has a significant role. Cinia's shareholders, customers, partners and suppliers think highly of sustainable development. The investments Cinia makes (e.g. data communications infrastructure) and the services it provides (software, cloud and communications services) serve to improve and develop the activities of companies and society to be more environmentally friendly, for example, through lower emissions, solutions that improve mobility and logistics and technological selections that take environmental loads into consideration.

Environmental responsibility is described in detail in Cinia's company sustainability report.

6. We make responsible acquisitions

When making sourcing, we comply with Cinia's sourcing policy and guidelines. Our sourcing is based on needs assessment and market terms, and we put sourcing out to tender in line with the sourcing guidelines to ensure cost-effectiveness. We also take environmental matters and sustainability, efficiency, economic efficiency and safety into consideration in our sourcing activities.

Our suppliers and business partners are required to comply with laws and agreements and to commit to this Code of Conduct.

7. We ensure data protection, information security and confidentiality

We respect people's right to privacy. We process all personal data in our possession confidentially and in compliance with data protection laws and regulations.

We respect the trade secrets of our customers and business partners and process confidential information carefully and in compliance with the law.

We ensure the information security of our services. Cinia's services are particularly designed for customers that require a high level of security and services, as well as special solutions. Success in these customer segments requires a high level of information security in internal activities and in the services provided by the company. When the working environment and activities follow a high level of information security, it is easier to carry out work-related tasks and the trust shown by customers towards Cinia's services improves.

8. We protect Cinia's assets and trade secrets

We look after Cinia's assets and trade secrets. We protect Cinia's assets against damages, unauthorised use and losses. Cinia's assets cannot be used for personal means or other external means without the consent of Cinia.

Data is our valuable asset. We protect the confidentiality, integrity and availability of Cinia's data and trade secrets.

9. We take care of each other

We want to ensure that Cinia is a good, equal and safe working place. Cinia is a company and community in which everyone is treated in a respectful, equal and non-discriminating manner. The obligation to promote equality and non-discrimination applies to Cinia as an employer as well as all members of the working communities. In 2016, Cinia prepared an equality plan that is updated every two years.

Cinia does not tolerate bullying, harassment or discrimination. Cinia commits to promoting equality and non-discrimination and to preventing discrimination in all of its activities, and to addressing non-discrimination as a natural part of operations, strategies and plans.

10. Training

Code of Conduct web training is part of the induction training provided to all Cinia employees. Cinia's Legal Affairs provides more detailed instructions and advice on how to interpret and apply the Code of Conduct, when necessary.

11. The Code of Conduct in practice

To ensure compliance with this Code of Conduct, consider if the transaction or decision is:

- permitted by law?
- in compliance with the Code of Conduct and Cinia's other guidelines?
- in line with our values?
- appropriate and independently made?

Consider also whether the transaction or decision appears acceptable from the outside.

If the answer to all of the above is YES, you may proceed. If the answer to one or several questions is NO or I DON'T KNOW, please contact your supervisor or Cinia's Legal Affairs.