

# CODE OF CONDUCT

## Revision history

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## Introduction

The Code of Conduct applies to all employees of WE Tech Solutions Oy ("WE Tech"). The Code of Conduct also includes the commitments WE Tech as a company is committed to follow.

WE Tech regards any violation of this Code of Conduct as a serious matter. A breach may expose the Company, its employees, and its products or services at substantial risk. Every employee is accountable for his or her own behaviour. Anyone who violates the policies described in this Code of Conduct will be subject to disciplinary action up to and including the termination of employment.

The WE Tech Code of Conduct is the cornerstone of our commitment to integrity. It provides an introduction to important laws and policies that everyone working for or representing WE Tech must follow. The Code of Conduct is designed to help each of us understand and follow the basic compliance and integrity rules that apply to our work.

The Code of Conduct organises and summarises important guidance into one convenient guide. However, it is only a starting point, and is not intended to describe every law or policy that may apply. It goes without saying that legal regulation shall always be followed.

WE Tech expects its subcontractors and suppliers to follow the rules stated in the Code of Conduct.

## **1 CORPORATE RESPONSIBILITY**

Corporate responsibility involves a duty to comply with all rules and regulations in force. WE Tech and its employees shall especially observe the following basic principles:

### **1.1 Human rights**

WE Tech and its employees respect and support the regulations in force worldwide to protect human rights as a fundamental and general requirement defined in United Nation's Universal Declaration on Human Rights. This also involves WE Tech refraining from employing forced or child labor. WE Tech supports basic labor rights by International Labor Organization including the minimum age of employment for children.

### **1.2 Equal opportunity and non-discrimination**

WE Tech and its employees do not discriminate on grounds of ethnic, national, or social origin, skin color, sex, religion, views, age, disability, sexual orientation, political views insofar as they are based on democratic principles and tolerance toward those of a different opinion, or any other legally protected characteristics.

### **1.3 Freedom of association**

The basic right of all employees to form trade unions and employee associations and to join them is recognized by WE Tech. In countries where this right is restricted by local laws, alternative legitimate options for employee participation shall be supported.

### **1.4 Product safety**

WE Tech and its employees comply with all applicable legal product safety regulations and requirements, particularly legal requirements pertaining to the safety, labeling, and packaging of products as well as the use of dangerous substances and materials.

### **1.5 Safety in the workplace and working hours**

WE Tech comply with the applicable legal regulations for health and safety in the workplace. WE Tech supports the further development and improvement of working conditions. Working hours correspond at least to the respective national legal standards.

### **1.6 Minimum wage**

WE Tech ensures that their employees are commensurately remunerated corresponding at the very least to the legally valid and guaranteed minimum. Where legal or collective bargaining agreements do not exist, compensation and benefits are based on industry-specific collective agreements customary to the respective location.

## **2 ENVIRONMENTAL AND CLIMATE PROTECTION**

WE Tech desires to make a significant contribution to environmental and climate protection.

### **2.1 Compliance with legal provisions**

WE Tech and its employees enhance and promote environmental protection and comply with the applicable legislation relating to the environment and sustainability.

### **2.2 Increase energy and resource efficiency**

WE Tech and its employees improve and promote the use of energy efficient technology. They contribute to reducing energy consumption and CO2 emissions.

## **3 TRANSPARENT BUSINESS RELATIONSHIPS**

Openness and transparency are key to credibility and trust in business practice.

### **3.1 Avoiding conflicts of interest**

WE Tech and its employees take decisions based solely on objective criteria and do not allow themselves to be guided by personal interests or relationships. The employees avoid situations with conflict of interests.

### **3.2 Prohibition of corruption**

WE Tech does not tolerate corruption and complies with the Rules of Conduct to Combat Extortion and Bribery of the International Chamber of Commerce. We Tech ensures that its employees, subcontractors and representatives do not grant, offer or accept any bribes, kickbacks, inadmissible donations, or other inadmissible payments or benefits to or by customers, officials or other third parties. This also applies to so-called “facilitation payments” (e.g. illegal payments to accelerate administration matters).

### **3.3 Gifts, hospitality, and invitations**

WE Tech and its employees do not offer their customers, business partners or third parties any inappropriate benefits either directly or indirectly in the form of gifts, hospitality, or invitations to unduly influence them. Neither do they ask for, nor accept such benefits.

### **3.4 States as customers and dealing with authorities**

WE Tech and its employees consistently comply with the strict legal provisions and OECD Convention on Combating Bribery of Foreign Officials in International Business Transactions when dealing with governments, authorities, and public institutions. When taking part in a public solicitation for bids, they comply with legal regulations and abide by the rules of free and fair competition.

### **3.5 Consultants and agents**

WE Tech only employ consultants or agents in line with the laws in force. WE Tech takes particular care to ensure that consultants and agents are only remunerated for consulting and agency services actually rendered and that the payments are commensurate with the performance rendered.

## **4 FAIR MARKET CONDUCT**

WE Tech is a fair and responsible market participant and adheres to its contractual obligations.

### **4.1 Free competition**

WE Tech complies with the antitrust legislation in force. In particular, it does not enter into any illegal anti-competitive agreements with competitors, suppliers, or customers.

### **4.2 Export control**

WE Tech complies with all applicable legal provisions for importing and exporting goods, services, and information.

### **4.3 Money laundering**

WE Tech complies with all applicable legal money laundering provisions.

### **4.4 Business information**

WE Tech publishes business information and report on their business activities truthfully and in line with the laws in force.



## **5 PROTECTION OF DATA, BUSINESS SECRETS, AND COMPANY ASSETS**

Confidential data, business secrets, and company assets have to be protected.

### **5.1 Data protection**

WE Tech and its employees observe all laws in force to protect the personal data of employees, customers, suppliers, and other parties concerned.

### **5.2 Protection of know-how, patents, trade and business secrets**

WE Tech employees take great care to protect the knowhow, patents, trade and business secrets of WE Tech.

### **5.3 Handling company assets**

WE Tech employees respect WE Tech's tangible and intangible assets and do not use them for unfair or non-business purposes.