

## **Erillisverkot Code of Conduct**

Ethical operating principles for employees

### **Working at Erillisverkot Group creates responsibility in everyday life**

For Erillisverkot Group, as a state-owned special-purpose company, responsibility and fairness are basic operating conditions and part of the company culture. Our operations are based on principles that both personnel and stakeholders can rely on. We are expected to perform our special task with particular high level of quality and to consider all aspects of responsibility in our operations. The ability to renew based on sustainable development is an important part of business in our changing operating environment. Only responsibly operating companies and work communities succeed.

Our customer base consists of authorities and organizations that are critical to supply safety and security. The ethical operating principles of the Erillisverkot Group are a collection of our fundamental principles of good business behavior and the methods we adhere to. The group has also published comprehensive internal policies and instructions. Additionally, we have created our own set of ethical standards for suppliers (the Code of Conduct for Suppliers). By combining our own core competence with the best operators, we create security that benefits society. We earn the trust of customers, the work community, the owner, suppliers, and society as general when we make responsible decisions every day. Security is done together.

Timo Lehtimäki  
CEO

### **Contents**

1. Values as activity guides
2. Good governance in business
3. Operation in interaction situations
4. Taking care of the group's assets
5. Fairly in the work community
6. Our impact on the environment and climate
7. Notification of malfunctions

## 1. Values as activity guides

**Our way of working in the work community and with customers and partners is based on our values. Values guide us to act responsibly.**

Responsibility is one of our core values and an important concept at Erillisverkot Group. Our definition of responsibility includes operational safety, continuity and cost-effectiveness, respect for people and the environment, as well as uninterrupted service. You carry out our unique duty as an employee of the Erillisverkot Group, by representing our company, and acting as a communicator. You are therefore required to comply by our operating guidelines and act as a respectful team member. In your professional community, together with clients and partners, you create network, look for fresh viewpoints, and co-create new ideas.

In your role, you actively share information and know-how while maintaining security and confidentiality standards and communicating in an understandable manner. You build mutual trust between employees, the state, customers, and society, as well as towards our operations and personnel, through open cooperation, interaction and communication. You are open to different points of view and constructive feedback. You handle confidential matters while protecting all parties' privacy.

## 2. Good governance in business

**We follow good governance in our work. It also defines relationships with stakeholders. The laws are the core that guide our operations.**

When you work with customers and partners, you follow good governance. Good governance is regulated by various laws, such as the Limited Liability Companies Act and the Act on Public Administration Security Network Operations, as well as the general laws of public administration when performing public administration tasks. In addition, the Ethical Operating Principles for employees apply to all employees at the Erillisverkot Group. The Ethical Operating Principles are supplemented by policies and instructions that specify different areas, such as the principles defined by owner control.

Following laws, operating principles, policies, and guidelines in decisions and identifying and reporting impacts in daily activities are all examples of good governance.

As an employee at Erillisverkot Group

- You are open for cooperation and a reliable contract partner. Your operations are planned and guided by customer needs. You compete with the procurement legislation of our service in the region.
- You are committed to combating the shadow economy, such as money laundering and corruption, including extortion and bribery.

### The state's goals for our business

The goal of the state's ownership policy is to achieve the best possible overall social and economic benefit, considering the social, regional and environmental effects of the operations. When the achievements of the goals are evaluated, it is determined how and at what costs the company fulfills its community service mission. The state's goal is for state-owned companies to be pioneers in transitioning to a carbon-neutral circular economy, utilizing digitalization and being sustainable. Part of

our business operates in the commercial market and some of our services do not seek profit. These non-commercial services are also produced cost-effectively for society, and also considering the environmental, climate and social effects.

### **3. Operation in interaction situations**

**We act fairly in interaction situations. Discrimination and corruption can also be hidden. So, it is important to be attentive.**

You act respectfully, fairly and kindly in all interaction situations. You are not intoxicated at work. When working at the Erillisverkot Group, you respect internationally recognized human rights. We do not discriminate against anyone on the basis of age, gender, origin, citizenship, language, religion, conviction, opinion, political activity, trade union activity, family relationships, health status, disability, sexual orientation or any other reason related to the person. If you notice something like this, you intervene effectively and tell your superior or, if necessary, via the notification channel.

#### **Hospitality**

When providing hospitality to the authorities, you must ensure that the benefit offered complies with the instructions given to the authorities on receiving hospitality as well as with the special legislation regarding to civil servants. When you cooperate with partners, you must use reasonable judgment. Do not offer or accept hospitality that could lead to a dependency relationship or an expectation of favors in return.

#### **Travel and accommodation expenses**

When you participate in a seminar trip or something similar organized by a partner, Erillisverkot Group pays the travel and accommodation expenses. Participating in a trip always requires a business reason and approval from your supervisor.

#### **Identifying corruption and bribery**

We do not accept the shadow economy in any form. Corruption and bribery are prohibited. This means that you do not give, demand, accept or receive a financial or other benefit that affects the objective and impartial performance of your duties. When participating in procurement or the procurement process, you must not accept unreasonable hospitality or gifts from suppliers. In return, you should not offer unreasonable hospitality, especially when the competition process is in progress. For instance, in this case, you must carefully consider if you would schedule a lunch meeting with a service provider taking part in the competition.

#### **Sponsorship**

Erillisverkot Group do not sponsor sports, culture or political activities. Sponsorship means financially supporting events, occasions, activities or a person/group. This also applies to the provision of services and products to an individual or group.

#### **Erillisverkot Group as a reference**

The Erillisverkot Group's business function and joint services must consider the benefits of acting as a reference and limit the use of the company's name and the scope of acting as a reference by contract. Acting as a reference in security network business is not advisable. Being a reference is

recorded in the contract and the content of the recording is agreed with the business representative and communication department. We want to ensure that our overall message remains consistent, and if necessary, we can intervene in unauthorized references.

#### **4. Taking care of the group's assets**

**We trust you. Make sure your actions are trustworthy and responsible.**

Taking care of the group's property means that you carefully handle the group's funds, premises, equipment and intellectual property rights in your work. Intellectual property rights mean, for example, copyright, patent and trademark rights and, in a broad sense, also trade secrets.

##### **Data protection**

In your work, you protect the content of confidential information from outsiders. This means data confidentiality and secrecy, data immutability (data integrity and usability) and securing the uninterrupted operations of information systems in all circumstances. In the process of managing the group's safety and risk management, the key concepts and responsibilities of safety are described. This process also includes the necessary security instructions for personnel and cooperation partners.

When you handle the information of customers and partners, you take care of confidentiality. Confidential information of the customers may not be disclosed to outsiders. You keep the results of the assignments confidential, unless they are public or the customer has given permission to make them public. If the assignment requires stricter confidentiality than usual, you agree on it separately in writing.

#### **5. Fairly in the work community**

**We treat each other equally in the work community. We take care of the balance between work and free time and your professional development.**

We want the personnel to appreciate being part of our work community. In our work community, you treat others fairly, kindly and equally and get along with everyone. "Things argue, not people". You are contributing to a healthy working community and its atmosphere. Bring a colleague along and seek expert opinions in collaboration to form a comprehensive overall picture and to help decision-making.

Erillisverkot Group supports the balance of working life and leisure. "With us, you can influence your work, your professional development and your future" - is one of the company's Employer Value Proposition. Erillisverkot Group offers various options to support its personnel regarding training and education.

Generally, vacancies are publicly advertised internally and/or externally. The employee is selected for the position based on qualifications, required education and suitability for the position. All of our employees undergo a security clearance in accordance with the Security Clearing Act. Salary is based on the demands of the tasks and performance in the task.

## 6. Our impact on the environment and climate

**Climate change is taken into account in our work. When we all make better choices, we can change the world.**

Erillisverkot Group's environmental and climate impact reduction efforts are focused on climate, energy, and waste. It is important to recognize that our activities have an indirect impact on the diversity of nature, i.e. biodiversity.

Environmental sustainability is what you take into account in your operations

- own and also customers' need to reduce the carbon footprint and
- sustainable development goals that will be implemented during several years.

We want to leave a good living environment for the next generations. Erillisverkot wants to promote carbon neutrality and support society's efforts in this goal. By developing the energy efficiency, low emissions, waste utilization and circular economy of our operations, we can offer more sustainable digital services to our customers. With the help of our services, our customers can also operate more resource-wise and with less burden on the climate.

You will recognize environmental impacts and opportunities to reduce them in your daily work. In your tasks, you consider the environmental impact, for example, by seeking information about the CO<sub>2</sub> emissions and energy consumption of the product/service to be purchased from the service or supplier.

### Adapting to climate change

Climate change is part of our everyday life. Adaptation is preparation for increasing extreme weather circumstances, such as strong winds and heavy rains or prolonged heat waves. By supporting Erillisverkot Group's environmental and climate actions, you encourage our partners by your own example to use and develop solutions that put less burden on the environment and to move towards our goal of carbon neutrality in 2035.

## 7. Notification of malfunctions

The Board of Erillisverkot Group ratifies the Ethical Operating Principles. The implementation of the principles is regularly evaluated and updated if necessary. If you suspect behavior that violates these principles, report it immediately to your superior, management or, if necessary, to the independent reporting channel used by personnel and third parties. Suspicions of activities contrary to the principles are investigated while respecting the protection of privacy.