

**EFICODE GROUP
SUPPLIER CODE
OF CONDUCT**



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Definitions

“Eficode Group” or **“Group”** means Eficode Holdings Oy and all (or any, as context may require) of the legal entities belonging to the same group of companies as it, as set out in the Finnish Accounting Act from time to time.

2 Important Information

Intended Audience

This Supplier Code of Conduct should be read by all individuals who have a responsibility for customer relationship management, compliance, bids & tenders, or procurement within the supplier organization.

Development of the Supplier Code of Conduct

This Supplier Code of Conduct has been developed as part of our wider strategy to promote ethical business practices and to foster responsible relationships with our supply chain. We believe that collaboration and education are key to tackling the challenges we face as a business, as people, and as a planet. We, therefore, invite all stakeholders to engage with us to develop best practices, reduce risk, and find innovative solutions to our shared problems.

We hope that this Code provides insight as to how we see the future of our value chain, as well as sets clear expectations about what we expect today. As we progress on our journey, we will keep this Supplier Code of Conduct under review and our communication with you open so that we can build the future together.



3 Introduction

We recognize that a successful business means more than just financial results. Responsible behavior is key to ensuring a sustainable business that thrives for years to come. The values that guide our behaviour are shown to the right.

Our values drive the actions we take every day, big and small. They underpin our role as a trusted and ethical partner to our customers, a fair and responsible employer to our people, a champion of change for our planet, and a contributing and accountable pillar in our community.

We are committed to playing our part in changing the world and believe that our relationship with our suppliers is a critical part of this commitment.



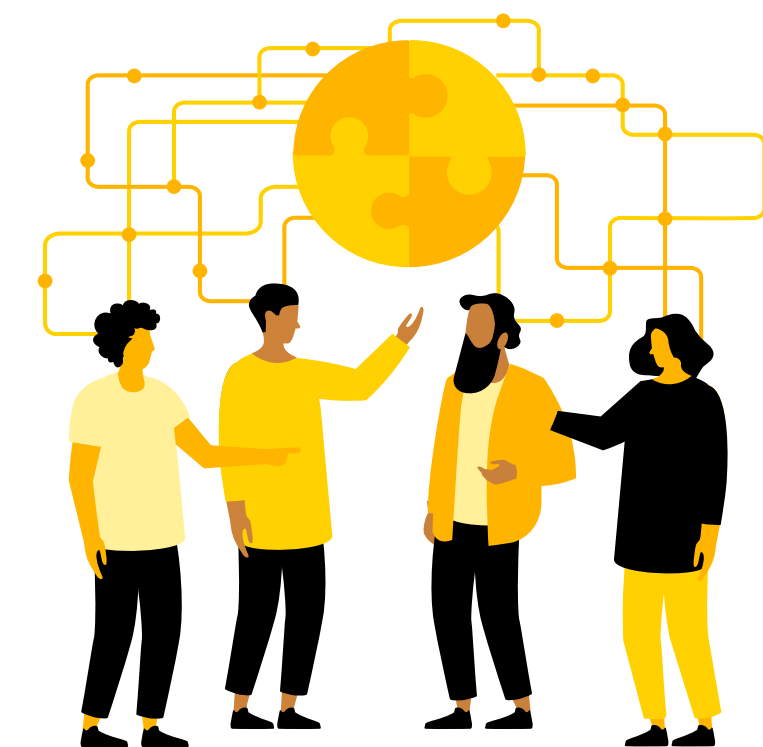
We want to change the world



We take pride in results



We learn every day



We complete each other

4 Understanding this code

To set out clearly what we expect from our suppliers and our suppliers' onward chains, we have developed this Code outlining the basic minimum requirements all suppliers must meet in order to work with us - we call these requirements our 'bare necessities'.

We believe that meeting the minimum legal requirements with respect to ethical business is not enough, not nearly enough. So, as we progress on our journey to change the world, we will be seeking out suppliers to work with that aim high above the bare necessities to achieve something better. We call this something better our 'expected standards'.

Suppliers that can evidence their progress against our expected standards will be prioritized in bids for service contracts.

Our goal is to cultivate a supply chain of like-minded organizations that want to change the way we do business for the better, creating people, planet, and profit equity.

These principles are not intended to conflict with or modify the terms of any contractual agreements entered into between us. Suppliers must comply with contractual arrangements in all circumstances.











5 People



Human Rights

Bare necessities

All our suppliers must undertake due diligence, supported by systems and processes, to ensure that:

-  Under no circumstances do they engage in any form of modern slavery, including human trafficking, forced, bonded, or indentured labor.
-  Under no circumstances do they engage in any form of child labor. 'Child' refers to any person under the minimum legal age for employment where the work is performed and/or the minimum working age as defined by the International Labour Organization (ILO), whichever is higher.
-  All work is voluntary on the part of the employees of the supplier.
-  All employees are provided with a written contract, in the employee's language,
-  clearly indicating their rights and responsibility regarding wages, working hours, benefits, and other working and employment conditions.
-  All employees receive at least the minimum legally mandated remuneration, rest periods, and annual leave.
-  They provide employees and third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting.
-  They comply with all applicable legislation in the countries they operate.

Expected standards

We expect suppliers to:

-  Pay employees in all instances a salary that is competitive in the current market conditions.
-  Review employee compensation and contractual benefits regularly to ensure they remain fair and competitive in the current market conditions.
-  Promote employee wellness and happiness through employer-sponsored initiatives.
-  Promote employee development and learning through employer-sponsored training.

Equity, Diversity, and Inclusion

Bare necessities

All our suppliers must:

- ✓ Treat every person with dignity, respect, and fairness.
- ✓ Provide equal employment opportunities without discrimination.
- ✓ Provide employees and third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting.
- ✓ Comply with all applicable legislation in the countries in which they operate.

Expected standards

We expect suppliers to:

- ✓ Develop inclusive policies across their organization.
- ✓ Engage in inclusive recruitment practices that encourage and promote a diverse workforce.
- ✓ Provide equity, diversity, and inclusivity training to all employees at least annually.
- ✓ Provide role-specific training to hiring managers and team leads on topics such as unconscious bias.
- ✓ Set equity, diversity, and inclusivity objectives within the organization.
- ✓ Monitor and measure & report on progress against objectives annually, creating and actioning improvement plans as necessary.
- ✓ Empower individuals through networks, awareness, and communication activities.



6 Ethical Business Practices



Quality and Compliance Systems

Bare necessities

All our suppliers must:

- ✓ Implement and comply with a code of conduct or, proportionate to the size and nature of the business, conform with a set of ethical business practices. Our code of conduct plays an integral part in our ethical business environment, and we believe this should be the same with our suppliers.
- ✓ Proportionate to the size and nature of their business, implement processes, policies, and programs that support compliance with all applicable laws and regulations.

Expected standards

- ✓ We expect our suppliers to have in place management systems that align with ISO 9001 and ISO 37301.





Anti-Corruption

Bare necessities

All our suppliers must:

- ✓ Comply with all relevant laws and regulations regarding anti-corruption as applicable to the jurisdictions within which they operate.
- ✓ Ensure that they do not offer, give, accept, or receive any payment, benefit, or gift that may be construed as a bribe, kickback, or other improper payment, gift, or benefit for any business purpose, whether directly or through a third party.
- ✓ Undertake reasonable due diligence to prevent and detect bribery and corruption in all their business arrangements.
- ✓ Have appropriate procedures in place to prevent such activity from taking place.

Gifts and Hospitality

Bare necessities

All our suppliers must:



Ensure that the offer, provision, request for, or receipt of any gift or hospitality is as permitted by law and regulation and does not violate the rules and standards of the donor and recipient's organization. Gifts and hospitality should never be made in cash or cash equivalents.



Have a gifts and hospitality policy in place and adhere to it.





Anti-trust and Competition Law

Bare necessities

All our suppliers must:



Conduct business in accordance with all applicable competition and anti-trust laws and regulations.



Not enter into formal or informal anti-competitive arrangements, whether to fix prices, rig bids, limit supply, allocate/control markets, or otherwise improperly restrict competition.

Risk Management

Bare necessities



All our suppliers must proactively manage and mitigate risk in their supply chain and, where appropriate, report risk to us to ensure those risks are properly mitigated.

Accurate Record Keeping

Bare necessities



All our suppliers must accurately and securely create, capture, store, and retain business records as appropriate and in accordance with all data protection laws and regulations.



Timely Payment

Bare necessities



All our suppliers must pay their suppliers on time and in accordance with agreed contractual payment terms.

Expected Standards



We expect our suppliers to support small businesses by offering them favorable payment terms.



Proper Payment of Taxes

Bare necessities



All our suppliers must properly and accurately record all financial aspects of their work to represent themselves accurately to all relevant tax authorities and ensure that appropriate processes are in place to prevent the facilitation of tax evasion by employees and other persons performing services on behalf of our suppliers.



Conflicts of Interest

Bare necessities



All our suppliers must identify and avoid actual, potential, or perceived conflicts of interest in their dealings with us. We understand that actual or potential conflicts do arise from time to time in the course of business. In such cases, suppliers must disclose conflicts to us and all other affected parties in a timely fashion



Trade Controls and Sanctions

Bare necessities

All our suppliers must:

- ✓ Conduct business in compliance with all applicable laws and regulations governing export, re-export, transfer, and import of controlled hardware, technical data, software, and services.
- ✓ Screen third parties with whom they do business and be fully compliant with all relevant financial sanctions, trade embargoes, and other restrictive measures imposed by any applicable government authority.

Intellectual Property

Bare necessities

- ✓ All our suppliers must comply with all applicable laws and regulations governing intellectual property, as well as any contractual obligations.



7 Information Security

Bare necessities

All our suppliers must:

- ✓ Develop, implement, and maintain, proportionate to the size and nature of the business, an information security management system to protect the information that they create, collect, handle, store, or are responsible for, in accordance with applicable laws, regulations, and contractual requirements, regardless of whether such information belongs to the supplier, us or our customers.
- ✓ Address any security issues proactively and notify and support us in responding to and remedying any security breaches in a timely manner.

Expected standards

We expect our suppliers, commensurate to the risks associated with the processing involved in providing the services, to:

- ✓ Where applicable, maintain certification against Cyber Essentials or Cyber Essentials Plus.
- ✓ Maintain certification against an industry-recognized standard such as ISO 27001 or equivalent.



8 Sustainability

As part of being an ethical and responsible company, we are committed to managing our business activities to reduce our negative environmental impact and to make a positive social and economic contribution to the communities we touch. It takes all of us, collectively, to make real change.



Planet

Bare necessities

All our suppliers must, commensurate with the size and nature of their organization:

- ✓ Comply with all applicable environmental regulations and legislation.
- ✓ Measure and report on their organizations scope 1 & 2 emissions.
- ✓ Limit the negative environmental impacts of their operations, taking into consideration energy consumption, waste management, the conservation of natural resources and biodiversity.
- ✓ Positively contribute to the fight against climate change by setting environmental goals, implementing climate action initiatives, and publicly reporting against their progress.
- ✓ Implement environmental policies and train employees on environmental issues.
- ✓ Work with us to implement action plans where environmental standards are not met.





**NET
ZERO**

Planet

Expected standards

We expect our suppliers to:

- ✓ Commensurate with the size and nature of the organization, implement an environmental management system such as ISO 14001, ISO 14005, or The Eco-Management and Audit Scheme (EMAS).
- ✓ Submit to an external assessment of their management system annually by a reputable independent third party.
- ✓ Publish the results of such an assessment and an improvement plan as appropriate.
- ✓ Commit to science-based carbon negative and net zero targets and publish progress against such targets annually.
- ✓ Tackle environmental issues with innovative, iterative, and collaborative solutions.
- ✓ Measure and report on scope 3 emissions.

Social Impact

Bare necessities

Many of the topics already mentioned in this Code contribute to an organization's social impact, in addition, all suppliers must:

- ✓ Develop a culture of 'giving back' that encourages and provides employees with opportunities to volunteer or contribute to social causes.
- ✓ Understand its social impact and take steps to reduce any negative outputs.
- ✓ Build positive social impact into the design and development of new services and products.

Expected standard

We expect our suppliers to:

- ✓ Set objectives around positive social impact and report progress against those objectives annually.
- ✓ Design and implement initiatives that promote innovation, collaboration, and change toward a positive social impact on a local, national, or global scale appropriate to the size and nature of the organization.



SOCIAL IMPACT

Summary

People - page 7	
Bare necessities	Expected standards
Comply with all applicable laws/regulations.	Competitive employee compensation and contractual benefits.
Do not engage in modern slavery.	Promote employee well-being & happiness.
Do not engage in child labor.	Encourage employee learning & training.
Give legal minimum pay/annual leave to employees.	Develop inclusive policies & recruitment practices.
Provide adequate communication channels for legal/ethical concerns.	Provide bespoke relevant training to employees.
Treat everyone with dignity and respect.	Monitor & measure on key performance indicators.
Provide equal employment opportunities.	
Provide adequate communication channels for legal/ethical concerns.	
Treat everyone with dignity and respect.	
Provide equal employment opportunities.	

Ethical Business Practices - page 10	
Bare necessities	Expected standards
Implement and comply with a Code of Conduct.	Implement management systems that comply with ISO 9001 and 37301.
Comply with all applicable laws/regulations.	Support smaller businesses by offering them favourable payment terms.
Do not accept any gifts/payments construed as bribes.	
Report suspected or actual bribery and take appropriate measures to prevent it.	
Ensure gifts given are permitted by law and adhere to applicable Gifts & Hospitality policies.	
Do not enter any formal/informal anti-competitive agreements.	
Proactively mitigate & report risks affecting the supply chain.	
Appropriately manage business records.	
Pay suppliers on time.	
Make correct representations to relevant tax authorities.	
Identify, avoid & report potential conflicts of interest.	
Screen third parties.	

Summary continued

Information Security - page 9	
Bare necessities	Expected standards
Develop and maintain an appropriate information security management system.	Maintain certification against Cyber Essentials, Cyber Essentials Plus, and/or an industry-recognized standard, i.e., ISO 27001.
Address any security issues and notify/support us to remedy them.	
Comply with all applicable laws/regulations.	

Sustainability - page 20	
Bare necessities	Expected standards
Comply with all applicable laws/regulations.	Submit to an external assessment by a reputable third party.
Measure and report scope 1 & 2 emissions.	Commit to carbon zero and net zero targets.
Limit negative environmental impacts.	Tackle environmental issues with collaborative solutions.
Positively contribute to fighting against climate change.	Measure and report on scope 3 emissions.
Implement environmental policies and training.	Set objectives around positive social impact.
Create action plans where standards are not met.	Design and implement initiatives that promote innovation, collaboration and change towards positive social impact.
Develop a 'giving-back' culture.	
Understand social impact and take steps to reduce negative outputs.	
Build positive social impact when developing new products/services.	