

Vastuu Group Code of Conduct

This Code of Conduct by Vastuu Group has been drafted to support responsible practices aligned with our values. Through these ethical business principles, we aim to describe how each employee of Vastuu Group can act responsibly and ethically in their respective roles and duties. These guidelines also take into account the principles of the United Nations Global Compact and the Sustainable Development Goals, to which Vastuu Group is committed. Together, we can build a more responsible and sustainable future.

Every Vastuu Group employee is committed to the following ethical principles:



1 We handle and utilise personal and business data responsibly

1.1. We provide reliable and high-quality data

We aim to promote trust between various parties by offering services that ensure the highest possible reliability and quality of data. We enhance the accountability of our customers and partners by sourcing the data used in our services from the most reliable sources available. We use information provided by authorities and other third parties whenever such data is accessible.

1.2. We use data transparently and in compliance with agreements and legislation

We are a trustworthy partner for our data sources and comply with all agreements and applicable legislation in the handling of personal and business data. Our data management processes are transparent, ensuring systematic compliance with legal and contractual requirements. We utilise data by meeting stakeholders' expectations and regulatory requirements.

1.3. We protect personal and business data by maintaining high standards of data protection and security

We are committed to comprehensive protection of the data we handle and use, ensuring high standards of security in our services. Our services and the data processed within them comply with the ISO 27001-certified information security management system and applicable legal requirements. We continuously strive to improve our information security management and to mitigate cybersecurity risks.

We comply with all data protection legislation in handling personal data. We maintain and develop a data protection management system to ensure that personal data is processed transparently, lawfully, and with respect for the rights of data subjects.



2 We comply with the law and empower others to do the same

We adhere to all applicable laws in our business activities and do not accept unlawful practices from subcontractors, customers, or any other parties. We address any identified misuse of our services for illegal activities.

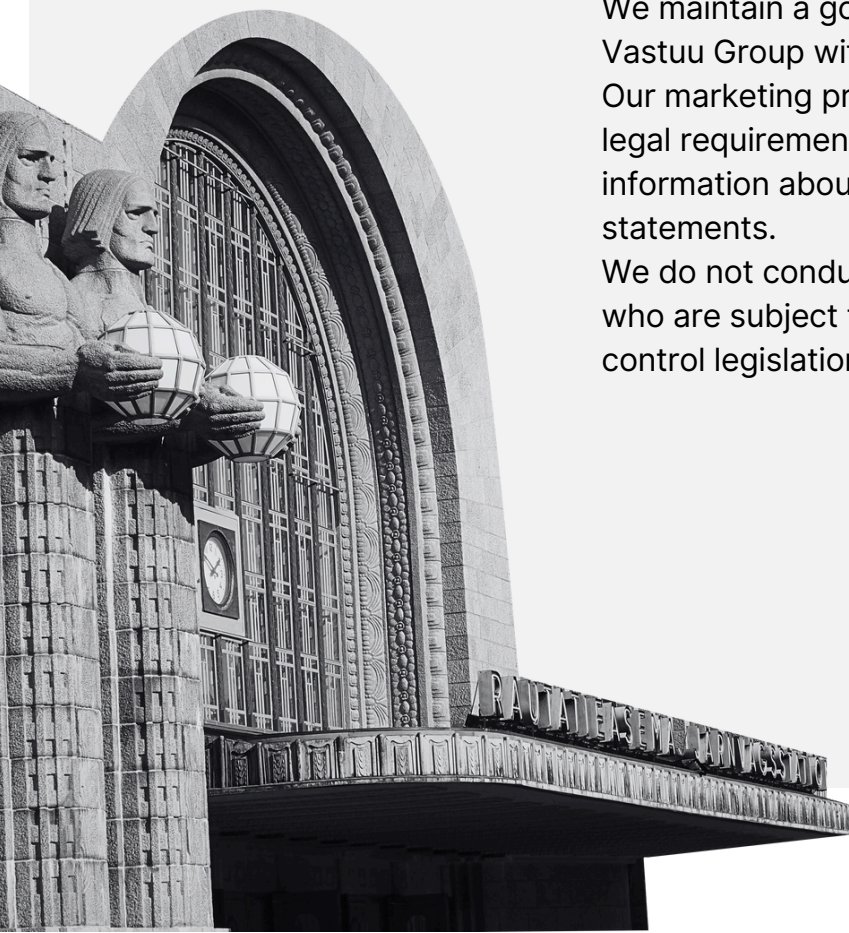
We contribute to combating the grey economy and support companies that fulfil their obligations responsibly. Our services help our customers comply with regulations and official requirements relevant to their operations and industries. We regularly cooperate with customers, stakeholders, and authorities to ensure that our services enable accurate and effective compliance with regulatory demands, official guidelines, and stakeholder expectations.

3 We are committed to fair competition

We respect and support open and effective competition that benefits not only us but also our customers and partners. We comply with competition laws in all our activities. We treat our customers and partners fairly and equitably.

We maintain a good corporate image and represent Vastuu Group with discretion, integrity, and honesty. Our marketing practices align with good customs and legal requirements. We provide clear and truthful information about our services and avoid misleading statements.

We do not conduct business with individuals or entities who are subject to sanctions. We comply with export control legislation.



4 We protect our intellectual property and respect the intellectual property and trade secrets of others

We safeguard the Vastuu Group brand and address any unauthorised use. We ensure that Vastuu Group holds adequate rights to the intellectual property used in our operations and services.

We use only source code in our services that is appropriately licensed and suitable for our business.

We ensure through our actions that Vastuu Group and our partners' trade secrets and confidential information remain secure, protected by appropriate technical measures and non-disclosure agreements. We only use tools that are internally approved for use with this type of data.

5 We do not tolerate bribery or corruption

We do not promise, offer, pay, give, or accept bribes or any other undue advantage. Examples include gifts, trips, or other benefits that are unreasonable or not part of customary hospitality, or that could result in conflicts of interest. We engage openly with authorities and follow their guidelines and hospitality rules. We do not accept informal payments to authorities in order to facilitate or expedite administrative processes.

Customary gifts and hospitality are permitted if they do not aim to influence decision-making, no return favour is expected, and they are:

- 1) Reasonable and relevant to business,
- 2) Occasional and of negligible value, and
- 3) Presented transparently without raising doubts about Vastuu Group's integrity.



6 We avoid conflicts of interest

Our employees prioritise Vastuu Group's interests in all business matters. Pursuing personal or close relatives' benefits directly or indirectly in work-related tasks is not acceptable at Vastuu Group. We avoid conflicts of interest that could impair our judgment in business matters. We disclose potential conflicts of interest to our supervisors and refrain from participating in decision-making in such cases.

We report any secondary occupations to our employer. When considering secondary occupations, we ensure that no conflicts of interest arise and that our duty of loyalty, non-competition obligations, and confidentiality commitments are upheld even during leisure time.

7 We treat one another with equality and respect

We treat employees and job applicants equally, without discrimination, and fairly in recruitment, remuneration, career opportunities, and other personnel matters.

We provide equal opportunities for all regardless of age, gender, ethnicity, nationality, colour, religion, belief or political opinion, marital status, sexual orientation, gender identity, disability, health, family status or any other personal characteristic.

We promote diversity, equality, and inclusion in the workplace.

We do not tolerate any form of direct or indirect harassment, inappropriate comments, bullying, or discriminatory behaviour.

We provide a healthy and safe working environment and are committed to promoting the well-being and long-term development of our employees.



8 We respect human rights

We respect and commit to upholding internationally recognised human rights in all our activities and promote their realisation throughout our value chain. Vastuu Group is committed to the principles of the UN Global Compact and the Sustainable Development Goals. We do not accept any violations of human rights in any form. We carefully select our suppliers and partners and require them to also commit to respecting human rights.

9 We minimise the environmental impact of our operations

We identify the environmental impact of our activities and continuously strive to minimise these effects. We aim to reduce our carbon footprint, minimise waste, conserve energy and water, and decrease emissions from our operations.

10 Reporting misconduct

This Code of Conduct applies to everyone working for Vastuu Group. Violations of these guidelines will always result in consequences, which may include disciplinary actions such as a warning or termination of employment. If you notice unethical or illegal activities, report them to your supervisor, human resources, or legal department representative, or to a member of the company's management.

If you feel unable or unwilling to report to any of the aforementioned individuals, you can file an anonymous report via Vastuu Group's **whistleblowing channel**. Instructions for reporting misconduct can be found **here**.

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- 2** We comply with the law and empower others to do the same
- 3** We are committed to fair competition
- 4** We protect our intellectual property and respect the intellectual property and trade secrets of others
- 5** We do not tolerate bribery or corruption
- 6** We avoid conflicts of interest
- 7** We treat one another with equality and respect
- 8** We respect human rights
- 9** We minimise the environmental impact of our operations
- 10** Reporting misconduct