

Code of Conduct

Fonecta Ltd

Index

General information	2
Basic principles	2
Compliance with competition law	2
Horizontal agreements	2
Vertical agreements	3
Abuse of a dominant position	3
Breach of the rules	4
Anti-corruption	4
Granting benefits to public authorities	4
Granting of benefits to non-public authorities	4
Confidentiality	4
Data security and privacy	4
Money laundering rules	5
Human rights	5
Discrimination	5
Principles of good business conduct in business relations	6

General information

Fonecta Oy and its affiliated companies (collectively "Fonecta") are committed to operating in accordance with laws, regulations, rules and high ethical standards.

This Code of Conduct serves as a legal and ethical guide for all Fonecta employees (collectively "Fonectans") and serves as the basic rules for Fonecta's internal and external activities. The Principles reflect Fonecta's values as an employer and as part of society.

Fonecta has appointed a Compliance Officer whose mandate is to ensure that Fonecta and its directors and employees comply with the Fonecta Principles. The Compliance Officer's role is to oversee these principles of good business conduct.

This Code of Good Business Conduct has been approved by Fonecta's Management Team and updated on 17 January 2023.

Basic principles

Complying with the law: each Fonecta employee is responsible for knowing and complying with the law in their area of responsibility. In addition to the consequences of the law, there are always consequences for intentional or negligent violations of the law. Each Fonecta employee is entitled to training on the law in his or her area of responsibility, if necessary.

Ethical standards: all Fonecta employees are expected to observe the highest possible ethical standards in their internal and external activities. This includes not only respect for and truthfulness with our partners, but also good labour law principles. Employees should prevent any form of unwanted behaviour.

Company reputation: the reputation of Fonecta is largely dependent on the actions and behaviour of Fonectans. Illegal or otherwise unacceptable conduct can cause significant harm to Fonecta. Consequently, every Fonectan must behave in a manner that promotes Fonecta's reputation.

Compliance with competition law

Fonecta is committed to acting in a fair competition manner. This includes strict compliance with competition law.

Horizontal agreements

Neither Fonecta nor its employees enter into agreements or actions with competing companies with the purpose of preventing or restricting competition. In particular, it is prohibited to:

- enter into anticompetitive agreements, restrict dealings with certain suppliers, share customers or markets with a competitor;
- discuss with competitors prices, capacity, sales, margins, costs or other information affecting Fonecta's competitive position, with a view to receiving similar information from a competitor.

Vertical agreements

In the European Union, vertical agreements, i.e. agreements and arrangements between suppliers and customers or patent holders and licensees, are prohibited. These include:

- the imposition of restrictions on the customer's resale price;
- restrictions on the customer's freedom to set delivery terms with its partners (e.g. geographical and customer restrictions)
- certain "*most-favoured-customer*" clauses
- certain exclusivity clauses
- non-competition agreements

In many cases, the duration and strength of the restriction and the market position of the companies involved will determine whether or not a restriction is prohibited. Fonectans should contact the legal department before entering into any agreement containing vertical restraints.

Furthermore, Fonectans may not impose a counter-purchase obligation on Fonecta from the customer, unless the purchase is economically justified and this has been expressly agreed with a member of the Management Team.

Abuse of a dominant position

Abuse of a dominant market position is prohibited in Finland. A dominant market position is defined as an exclusive right or other dominant position held by one or more traders or a consortium of traders in a given product market covering the whole country or a given territory, which significantly affects the price level or the conditions of supply of a product or similarly affects the conditions of competition at a given level of production or distribution.

An undertaking with a dominant position on the market is subject to certain specific obligations vis-à-vis its business partners and competitors. There are many possible forms of abuse of dominant position and, depending on the perspective, they can be classified in different ways.

According to Section 7 of the Competition Act, abuses may include in particular:

1. directly or indirectly imposing unfair purchase or sale prices or other unfair trading conditions;
2. limiting production, markets or technological development to the detriment of consumers;
3. applying different terms to similar performance by different trading partners in a way that places them at a competitive disadvantage; or
4. making it a condition of the contract that the contracting party accepts additional performance which, by its nature or according to commercial usage, has no connection with the subject matter of the contract

However, the list of examples of abuses listed in the law is not exhaustive. Moreover, the different forms of abuse often overlap: for example, abuse can take the form of price-fixing, refusal to deal or discrimination.

Fonecta does not currently have a dominant position in any part of its business.

Breach of the rules

A breach of competition law not only renders the agreement invalid, but can also lead to significant fines and damages claims that can jeopardise Fonecta's operations. Therefore, Fonecta has a zero tolerance policy for competition law infringements. These violations will always lead to sanctions against the offending employee.

Anti-corruption

Fonecta is committed to the principles of fair competition. These include, for example, competing on price and quality of services and products, but not by offering unconventional advantages or benefits.

Granting benefits to public authorities

Fonectans may not, directly or indirectly, offer, promise, give or authorise the giving of money or any other pecuniary advantage to a public authority or a person associated with a public authority in order to influence that person's activities, a tender procedure or to obtain a personal advantage.

Public authorities include.

- a municipal, state or church official, employee or representative;
- a representative, candidate or employee of a political party; or
- any other person exercising public authority, e.g. on behalf of the state or a public authority.

A benefit can be any monetary benefit, including a discount, gift, dinner out, favour, etc.

Granting of benefits to non-public authorities

Fonectans shall not, directly or indirectly, offer, promise, give or authorise the giving of money or any other pecuniary advantage to any person for the purpose of influencing that person's job description.

Any offer of money or immoral advantage is strictly prohibited.

Fonect employees may not use their position to solicit, accept, demand or obtain personal advantage. Only benefits that can be considered part of normal business and do not affect Fonecta's reputation may be considered permissible.

Confidentiality

Confidential information received from third parties (e.g. through acquisitions or other cooperation) must be protected in the same way as Fonecta's own confidential information.

Data security and privacy

Fonecta's business is based on data, so securing it and protecting data and privacy are of paramount importance to Fonecta. Fonectans play an important role in protecting and securing their data. Every Fonecta employee has a responsibility to

- unauthorised access to Fonecta premises is blocked
- no sensitive/protected material is left visible at the workstation
- Protected / sensitive documents will not be removed from Fonecta's premises unless justified/unnecessary.
- laptops are protected against theft and unauthorised use
- secure passwords are used and changed regularly and not disclosed to outsiders
- computers are updated regularly, by connecting them to the Fonecta network for automatic updates
- any external IT devices with unknown content (e.g. memory sticks or external hard drives) are not
- be attached to Fonecta computers without the permission of the IT department
- no software is installed on computers without the approval of the IT department

Money laundering rules

Fonecta is committed to doing business only with trustworthy operators who operate in accordance with the law and whose financing is arranged through legal means.

Human rights

Fonecta respects and promotes human rights in accordance with the United Nations Declaration on Human Rights. We are committed to the fundamental rights and freedoms of all people, to which all people are entitled regardless of nationality or ethnic origin, gender, gender expression, gender non-conformity, religion or belief, language, sexual orientation, age, disability or any other personal factor.

Human rights include the right of everyone to decent work, freedom of choice of employment, fair and satisfactory working conditions and the right to equal pay for equal work without discrimination of any kind. In addition, everyone who works has the right to a fair and adequate wage which provides him and his family with a decent standard of living, supplemented by other means of social protection where necessary. Everyone has the right to form and join trade unions for the protection of his interests (Article 23). Fonecta respects freedom of association and is organised in an employers' association.

Fonecta supports [the principles of the International Labour Organisation, ILO](#).

Fonecta respects work safety regulations (including [the Occupational Safety Act](#)).

Discrimination

It is important for Fonecta that all employees feel that Fonecta is a safe and non-discriminatory workplace where they can express themselves and feel a sense of belonging. Trust and respect for all is the basis of Fonecta's culture. Together, every Fonecta employee is responsible for ensuring that the work environment is inclusive and free from discrimination and harassment.

Fonecta respects equality in working life and does not tolerate illegal discrimination against its employees. In this context, Fonecta promotes equality by complying with the measures prescribed by [the Equality Act](#) as

an employer by drawing up an equality plan at least every two years, in particular on pay and other conditions of employment, in accordance with which equality measures are implemented at Fonecta. Fonecta applies the principle of fairness in remuneration, which means that the same pay is paid for the same performance.

Fonecta does not tolerate harassment, including sexual or gender-based harassment in any form. **Sexual harassment** means verbal, non-verbal or physical conduct of a sexual nature that is unwanted and which intentionally or actually violates the mental or physical integrity of a person, in particular by creating an intimidating, hostile, degrading, humiliating or harassing environment. **Sexual harassment** is defined as unwanted conduct related to a person's sex, gender identity or gender expression, which is not of a sexual nature and which intentionally or actually violates the mental or physical integrity of a person and creates an intimidating, hostile, degrading, humiliating or intimidating environment.

Fonecta does not accept discrimination in any form. Fonecta promotes the prohibition of discrimination in accordance with the Equality Act, according to which no employee may discriminate against another employee, supplier or partner on the following grounds:

- age
- Origin
- citizenship
- Language
- religion
- Conviction
- Opinion
- political action
- trade union activities
- family relations
- health status
- disability
- sexual orientation
- other personal reason

Discrimination is prohibited whether it is based on a fact or assumption about the person or someone else.

At Fonecta, we also make no assumptions about, for example, each other's gender, family relationships or background. We respect everyone's right to self-definition, the right not to be defined and the right to change their definition. We give each other space and pay attention to our choice of words and the fact that, despite good intentions, we may unknowingly offend each other.

Principles of good business conduct in business relations

Fonecta informs its suppliers and partners about the main points of this policy. Fonecta also expects its suppliers and partners to commit themselves to.

- compliance with laws and regulations (in particular money laundering and competition law);
- respect for human rights;
- respect for labour rights;

- compliance with occupational safety regulations; and
- to protect the environment.

Fonecta expects suppliers and partners to demand the same from their suppliers and partners.

When selecting suppliers and partners, Fonecta pays attention to the commitment of the supplier/partner to these principles by providing them with Fonecta's Partner Policy.