



# Code of Conduct Policy

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# 1 Our Company values in action

## Code of Conduct as the company's compass

Our company is committed to maintaining the highest standards of ethical conduct in all aspects of its business and operations and in line with internationally recognized responsible practices.

Building on our core values of openness, trust and diversity, our company Code of Conduct (the Code) outlines what is expected from each employee as well as from the company to operate ethically.

The Code serves as a compass to guide all employees, board members, sub-contractors and other company representatives in all the countries where we operate. The Code provides overall direction for: **doing business ethically, respecting others and acting responsibly in the marketplace** – underpinned by our company Policies, Rules and Processes which provide specific instructions on how employees engage with each other, customers, suppliers and with the societies in which our company operates.

**Business is all about trust.**

**And trust is built on integrity.**

**Every employee's decision matters.**





# 2 Do business ethically

In our company we are committed to acting with integrity and have zero tolerance for any unethical behaviour. We apply a “precautionary principle” in everything we do. In other words, we proceed carefully when there is a reason to believe that a potential action may negatively impact a person’s health or wellbeing, society, or the environment.

As employees, board members and company representatives, we act in the best interests of our company, and not based on personal considerations or relationships. All decisions and external commitments are made at the appropriate level and in accordance with our company’s Decision-Making Authority (DMA).

## 2.1 Anti-corruption and improper payments

Our company does not tolerate abuse of power, nepotism or bribery under any circumstances. Our company opposes all forms of corruption and improper payments. This includes giving or receiving something of value that may influence, or be perceived to influence, a decision or a transaction.

Business fraud of any kind, falsification of financial statements, abuse of power or offering, giving, promising, extorting or receiving illegal benefits are all strictly prohibited. Facilitation payments are regarded as bribes and are strictly prohibited. These include any payments, irrespective of amount, or gifts made to a person or persons, e.g., government employees, to speed up or secure an administrative process or approval.

## 2.2 Gifts, hospitality and similar benefits

As employees or representatives, we are strictly prohibited from offering or receiving favours, valuable gifts, free trips, illegal payments, kickbacks, or any items of value that may inappropriately influence or be perceived to influence a customer, supplier or business partner to order, purchase or use our products and services. This applies even when accepted by law and irrespective of whether such incentives are provided directly or indirectly through a third party – such as an agent, supplier, business partner or consultant – or in the form of a sponsorship or charitable contribution.

Gifts, hospitality and business courtesies can only be accepted or offered if they are minimal in value and frequency, and if the time and place are appropriate and proportionate in the context of our business activities.

When our company has a business interest in participating in an event, the company bears the cost. As employees, we are not allowed to solicit or accept personal compensation for events.

The authority to approve sponsorships and donations is regulated according to our company Decision-Making Authority (DMA).

Our company does not make any charitable donations to or on behalf of our customers, partners and suppliers.

## 2.3 Conflicts of interest

Employees and representatives are required to avoid any situation where a personal interest conflicts or appears to conflict with the interests of the company.

Employees or representatives of our company are prohibited from influencing a company decision that may result in personal gain or gain for a family member or someone else that an employee may have a close relationship with. Employees and other company representatives cannot take part in or attempt to influence a process, a decision or a settlement if there is a conflict of interest, or if other circumstances exist that could provide grounds to question the individual’s or our company’s impartiality.

## 2.4 Duties, positions and ownership in external businesses and organizations

Engagement in external duties and positions, including roles in start-ups, sole proprietorships, or board directorships, must not affect your work at our company, or otherwise come into conflict with our company's business interests.

Make sure that you confirm with your manager that engagements outside your normal job responsibilities do not create a potential or perceived conflict of interest. Upon request, you are to provide information to our company about any sideline occupations. Our company may require you to completely or partially cease a sideline occupation that, in the view of our company, acts as an obstacle to the company's work.

## 2.5 Fraud

Our company is committed to preventing and detecting fraud of any kind. Fraud is a type of theft from intentionally misleading someone, hiding the truth, or promoting a concept or idea that is false and could result in unlawful gain, profit, advantage, harm or loss to our company or another party. Any act that intentionally conceals or misstates facts with the aim of misleading others – including customers, suppliers, third-parties or colleagues – is considered fraudulent and thereby not tolerated.

## 2.6 Handling of information

The employees of our company, and other people associated with the company have a duty to protect the integrity and security of information in our stewardship in accordance with applicable Policies and Rules and applicable laws. The misuse or disclosure of any Information classified as Internal, Confidential or Secret is prohibited. This includes information owned by our company and information classified as Confidential or Secret from our customers, suppliers, business partners, or another third-party.

In addition, we must exercise caution when discussing internal matters in order to avoid being overheard by persons not associated with the company. This duty of confidentiality applies not only externally, but also towards other employees in our company, who may not be allowed access to the information. Our duty of confidentiality applies even after the termination of employment or after the end of a contractual relationship with our company, in accordance with the locally applicable periods.

## 2.7 Safeguarding corporate assets

At our company, all of us are responsible for using the company's tangible and intangible assets only for legitimate business purposes and for protecting them from loss, damage, or unauthorized use. We must always observe security requirements concerning access to and the use of our company's physical facilities and resources, as well as online documents and other electronic resources.

Intellectual property – including but not limited to documentation, source code, scripts, integrations, know-how, methodology, concepts, inventions and ideas – is protected and managed in the interest of Our company and in accordance with relevant regulations. Similarly, the intellectual property rights and trade secrets of others are respected, and infringement upon such rights is avoided.

## 2.8 Security

Security is of the utmost importance in safeguarding the integrity, effectiveness and availability of our products and services, maintaining a secure environment for our employees, customers and partners, and maintaining trust among stakeholders.

Building on a strong security culture, protective measures implemented and enforced in our operations include mechanisms to protect sensitive information, prevent unauthorized access or misuse, and uphold the integrity of our systems and data.



## 2.9 Privacy

At our company, we respect individuals' right to privacy and process personal data in a lawful, fair and transparent manner. Our company is committed to respecting and safeguarding the privacy of everyone we interact with, including employees, customers, suppliers, and business partners. Processing of personal data is limited in scope and duration to what is deemed necessary and in accordance with applicable data protection legislation. Our company has strict requirements and processes in place to protect personal data from unauthorized access or unintended disclosure. This applies also to information entrusted to Our company by others, such as customers or suppliers.

## 2.10 Trade Compliance

Our company does business in many countries. Employees involved in cross-border transactions on behalf of Our company, or a customer comply with all applicable trade regulations, including export controls, trade restrictions, trade embargoes, economic sanctions, and boycotts.

## 2.11 Money laundering and terrorist financing

Our company is opposed to all forms of money laundering or terrorist financing. As such, we have controls in place to prevent financial transactions with any company or subsidiary suspected of supporting terrorist activities or money laundering.

# 3 Respect for others is fundamental

We always treat our colleagues, business partners and other actors in our value chain with dignity and respect. This means recognizing and promoting diversity. We provide fair, safe, and healthy working conditions where everyone's rights are protected.

At our company, we support and respect all internationally recognized human rights, as expressed in the Human Rights Policy and in alignment with the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the UN Global Compact fundamental human rights, as defined in the International Bill of Human Rights. These human rights are known, understood, respected and applied equally to all employees, whether temporarily or permanently hired or contracted.

We respect and promote freedom of expression and privacy protections. This includes raising concerns about legislative, administrative, license or law enforcement rules if they may negatively impact individuals' freedom to express their views or compromise their right to privacy.

## 3.1 Non-discrimination and equal opportunities

At our company, we treat people on equal terms and do not allow any discrimination on the basis of sex, gender identity, nationality, religion, belief system, race, age, mental or physical disability, marital status, sexual orientation, political opinion, membership or non-membership of unions, or social or ethnic origin.

Our strong opposition towards any discrimination applies not only to recruitment, but to all decisions relating to training, promotion, continued employment and working conditions in general, as well as to our relationship with suppliers, customers, business partners and other third parties. We are proud to promote a culture of equal opportunities and diversity.

We aim to create an inclusive workplace where differences are welcomed and respected, and where employees are given equal opportunities to grow. All managers at Our company are expected to work actively to ensure diversity in their teams, including a balanced gender composition.

## 3.2 Forced labour

Any employment relationship with our company is freely chosen and free from threats. Our company opposes all forms of compulsory, bonded or forced labour, including trafficking. Employees are always free to leave their employment after the specified notice period.

## 3.3 Child labour

Our company upholds international and local child-labour standards across all our businesses. No person under 15 years of age or below the country's legal minimum age are employed by Our company. Persons under the age of 18 do not perform any hazardous work, including but not limited to exposure to physical or psychological stress.

## 3.4 Freedom of association and the right to collective bargaining

At our company, we support freedom of association and the right to collective bargaining. All employees have the right to be or not to be members of a trade union and to bargain collectively. No disciplinary action is taken against employees who choose or choose not to organize or join an association. As employees of our company, we must not interfere or in any way obstruct other employees' freedom of association, or the right not to join an organization. Our company's employee representatives are allowed to carry out their functions unhindered in the workplace.



### 3.5 Fair employment conditions

Our company promotes secure employment and respects and upholds everyone's right to fair and favourable working conditions.

As a responsible employer and business partner, we respect fair and reasonable compensation principles. This means paying a living wage or compensating in line with industry standards – whichever is higher. Deductions from fixed salaries or wages as a disciplinary measure are not permitted.

We respect the right to rest and leisure as part of supporting a healthy work-life balance, including working hours that comply with all applicable laws and industry standards. To support work-life balance, employees are offered flexible working conditions whenever possible. Our company managers are expected to set an example in their approach to work-life balance.

### 3.6 Health and Safety

Our employees' well-being is essential to our company. As such, we promote good health and a safe working environment in compliance with internationally recognized standards.

We work actively to control hazards and take all necessary precautions to prevent accidents and occupational diseases. We have a common responsibility to ensure that our working environment is free from all forms of bullying, harassment and acts of violence, including physical, verbal or written harassment (whether at the office, online, or outside the office). We do not tolerate any behaviour that can be perceived as degrading or threatening.

### 3.7 Alcohol and drug abuse

We are committed to ensuring a safe working environment free from alcohol and illegal drugs. We care for each other, and therefore we encourage all employees to seek help for alcohol and/or other substance-abuse problems by speaking with their manager or HR partner. Company hospitality events and social activities are exempt from sobriety requirements, but alcohol may not be consumed in a manner that risks harming participants and/or Our company's interests. Non-alcoholic alternatives are always available.

# 4 Act responsibly in the marketplace

At our company, we seek to earn and maintain the respect and trust of all our stakeholders. As company employees and representatives, we treat everyone we encounter in the marketplace with the same ethical standards as we treat our colleagues.

## 4.1 Responsible solutions

We understand that the digital services and solutions we create have an impact on people's lives and we take this responsibility seriously. Thus, we collaboratively address the potential ethical and human rights risks of our services and solutions, including privacy and discrimination risks. We take a lifecycle approach, from development to usage of our services and solutions during the entire lifecycle, considering both normal usage as well as cases of potential misuse. This includes risks to human rights and risks to the right for privacy and non-discrimination.

We also understand that we are developing services and solutions for a range of end-users. As such, our solutions are designed to be accessible to all users – regardless of their physical or cognitive abilities.

In cases where serious ethical and human rights risks cannot be mitigated, our company is committed to stopping the release and delivery of the solution in a responsible manner.

## 4.2 Political activity

Our company does not provide financial or any other kind of support or assistance to individual politicians, candidates, political parties or institutions. Neither our company name nor any resources controlled by our company may be used to promote the interests of political parties or candidates. Employees participating in political activities are granted leave from their work in accordance with relevant laws and agreements.

## 4.3 Fair competition

Our company abides by antitrust and competition laws. Rules and procedures are in place to ensure that Our company does not cause or contribute to any breach of competition regulations, including but not limited to illegal agreements between competitors that aim to restrict or prevent free competition, fix prices or otherwise promote illegal trade practices. Our company never demeans the products or services of our competitors.

## 4.4 Responsible communication

Our company is a company that complies with regulations governing public communications to external stakeholders. We ensure that all information from Our company is reliable, correct and complies with the highest professional and ethical standards. Communication with media, including social media, public or financial markets, takes place in accordance with established procedures, complying with the applicable rules and practices.

Only official company spokespersons are allowed to release external statements or answer calls from journalists, analysts or similar. All external enquiries are forwarded to the company's Newsdesk.

Representation of the company on external platforms should be done in accordance with the highest professional and ethical standards.

## 4.5 Relations with customers, suppliers and public authorities

We engage with customers with insight, respect and understanding to fulfil their needs in the best possible manner within the ethical guidelines and regulations that apply to our business. We also select and treat suppliers impartially and fairly. We engage with public authorities in an appropriate and transparent manner.

## 4.6 Accounting and reporting

All accounting and reporting by our company is conducted in accordance with generally accepted financial principles. Our accounting practices ensure that business transactions are documented and reported in full, accurately and in a timely manner. All financial disclosures are transparent, relevant, timely and understandable.

## 4.7 Responsible procurement

Our company expects its suppliers and service providers to comply with all applicable laws and regulations. Suppliers that have a contractual relationship with our company must adhere to the principles outlined in our Supplier Code of Conduct, which sets minimum standards in key areas such as business ethics, anti-corruption, human rights, security and privacy, and labour conditions.

When making purchases as an employee of our company, we should always use the official procurement channels.

## 4.8 Environment

Our company is committed to conducting business in a sustainable way and continuously improving our environmental performance. We recognize that our business activities can have both a negative and a positive impact on the environment.

Negative impacts are related to energy consumption and greenhouse gas emissions from our offices, data centres, business travel, and procurement activities, as well as from our use of natural resources. Positive impacts can be achieved through enabling the potential of our digital technologies to help our customers and society at large to improve their climate performance and resource efficiency in their journey towards a decarbonized and circular economy.

Our company supports a precautionary approach to environmental challenges and to continuously improving our environmental performance. We are committed to limit the global warming of the planet to 1.5 degrees compared to the pre-industrial level, and we are constantly evaluating and implementing ways to reduce our own emissions. Our company follows circular-economy practices from a product life-cycle perspective – aiming to save natural resources and reduce environmental impacts related to energy and material usage.

# 5 Roles and responsibilities

**All employees** and company representatives have a role to play in living up to our commitments in our daily work. Together, we have a shared responsibility for our environmental performance and best practices.

**Process Owners** are responsible for embedding the overall directions from the Code into applicable Policies, Rules and Processes – and corresponding controls and systems – as well as for raising awareness and offering relevant training. Managers are responsible for ensuring that both the content and the spirit of the Code are communicated and applied in daily work across our organization.

**Managers** are also responsible for fostering an environment where people feel comfortable raising concerns and report any behaviour suspected of being non-compliant.





# 6 Violations

Our company abides by the local laws and regulations of each country and jurisdiction in which we operate. In situations where the law does not provide specific guidance, our company applies its Code of Conduct. In cases of a conflict between relevant laws and the principles described in this Code, the higher standard always prevails. Policies, Rules, Processes, and Procedures, governed as part of the company Integrated Management System, provide instructions on how to comply with specific requirements.

At our company, we have zero tolerance for violations of the Code. Failure to comply with the Code and its underpinning Policies and Rules is taken very seriously. Disciplinary action – including dismissal and prosecution – may be applied in cases of violations.

## Reporting of suspected violations

### **When in doubt – speak up!**

Our company is committed to a culture where everyone feels comfortable raising concerns. This ensures that suspected violations are addressed and improves the way we do business, so that we always behave ethically and comply with applicable laws. Our company prohibits retaliation against anyone who reports suspected violations in good faith.

All of us are responsible for drawing attention to matters that may compromise the Code, our Policies, Rules, Processes and Procedures, or local laws. Failure to speak up is in itself a breach of the Code. You do not need to be certain of a violation or have evidence of a breach to report a concern. Once a potential violation is reported, it is reviewed thoroughly, and corrective actions are taken.

You can seek guidance or report a concern through the following channels:

### **Your manager or HR partner**

You can raise concerns to your manager or your manager's superiors. Managers are responsible for helping their team members to understand and apply the Code, as well as to comply with applicable Policies, Rules, Processes and Procedures as well as local laws.

### **HR Function**

In cases when you may not feel comfortable discussing a given issue with your manager, you can reach out to HR.

### **Compliance Function**

You can also report suspected violations, ask questions or raise concerns directly to the Compliance Office. Any communication with the Compliance Office is kept confidential and, if requested, also kept anonymous and regarded as legal privilege.

### **The whistleblowing channel**

Reports of violations may also be made through our external whistleblowing channel –

<https://techservices.integrityline.com/>. All reports are confidential and can be made in full anonymity according to the Whistleblowing Rule.

# 7 Alignment statement

The objectives and principles of this Policy are in alignment with other relevant Policies and embedded into applicable Rules, Processes and Procedures.

Deviations are directed to Policy Owner according to established procedures to mitigate and prevent reoccurrence.

Suspected Policy violations are reported to the direct manager or relevant escalation point to ensure that applicable mitigating and disciplinary actions are taken.



# 8 Document information

## 8.1 Governing data

**Document Owner**  
Managing Director, Satu Kiiskinen

**Document Manager**  
Head of People and Culture, Hanna Vuorikoski

**Last review**  
2025-08-11

**Next review**  
2026-08-11

**References**

## 8.2 Change history

Version	Approval date	Editor	Reviewed by	Approved by	Changes
1.0A	2025-08-11	Milla Kivioja	Kia Haring	Satu Kiiskinen	First version of the Policy

### About Vivicta

Vivicta is a trusted Nordic transformation partner making everyday easier through technology. In a world of constant change, we are with our customers, helping unlock new digital opportunities and elevate their business. We provide fit-for-purpose digital solutions to accelerate customers’ transformation. Our 7,000+ experts globally drive end-to-end excellence across Data, Automation & AI, Cloud & Infrastructure, ERP & Applications, and Digital Security. With a get-it-done attitude, we commit to deliver elevated impact. [www.vivicta.com](https://www.vivicta.com)

