

Supplier Code of Conduct Policy

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1 Introduction

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

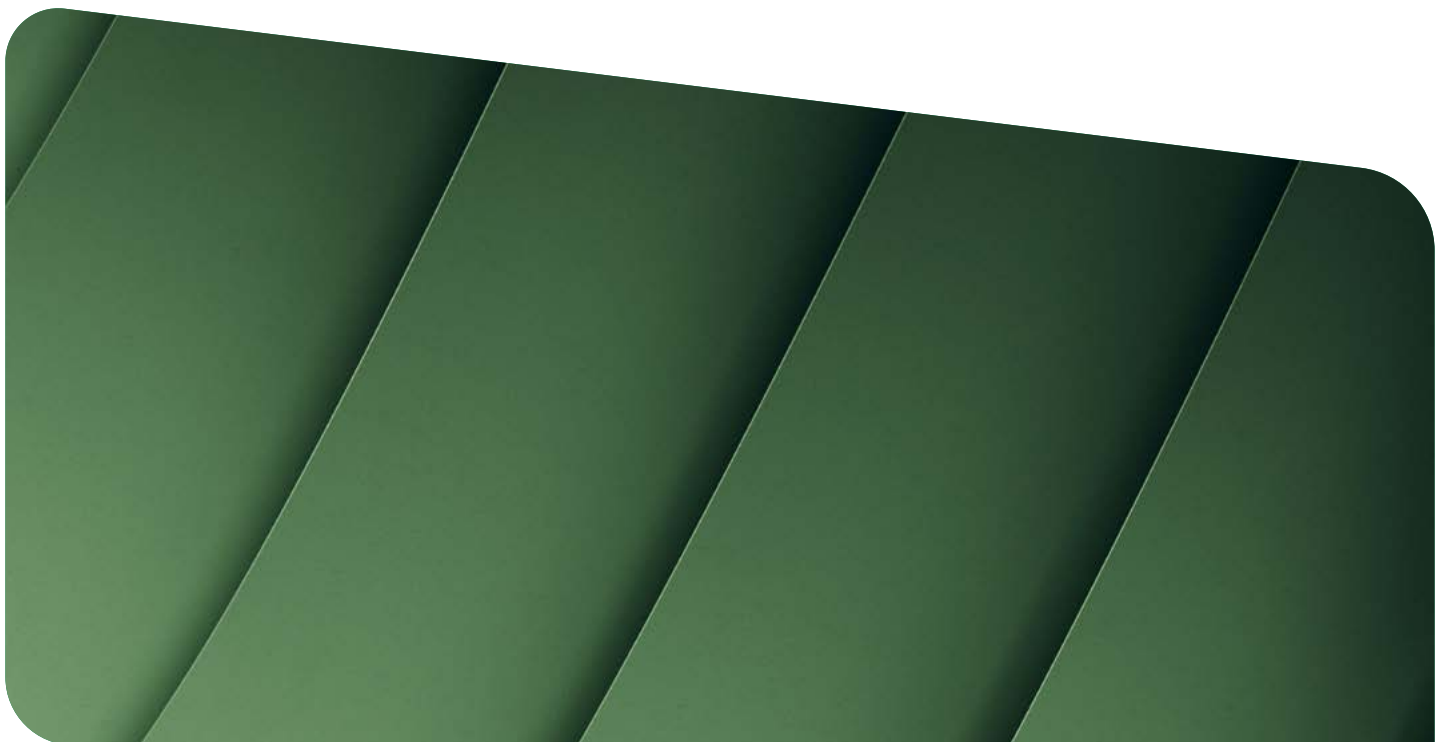
To do business with our company, suppliers, as well as their subsidiaries, agents, affiliates and subcontractors (Suppliers) are expected to comply with all applicable laws and regulations and adhere to our company's Supplier Code of Conduct and apply a "precautionary principle" in their operations.

Our company's Supplier Code of Conduct (the Supplier Code) outlines what is expected from Suppliers in ensuring that they do business ethically, respect others and act responsibly in the marketplace and in the societies in which they operate.

It sets minimum requirements in key areas such as business ethics, anti-corruption, human rights, environment, security and privacy, and labor conditions throughout the value chain in alignment with the internationally recognized standards, including the United Nations Guiding Principles on Business and Human rights, the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, Science Based Target initiative, and the United Nations Global Compact.

As a condition for doing business with our company, Suppliers must actively work to implement the requirements in this Supplier Code within its own operations based on the risk landscape inherent to their business and place the same expectations on their supply chain.

In cases of conflict between applicable laws and regulations and the expectations described in this Supplier Code, suppliers are expected to comply with the highest standards.



2 Do business ethically

Suppliers to our company are expected to ensure their employees act with integrity and demonstrate zero tolerance for any unethical behavior in their interactions with our company and within their own operations and supply chain. Suppliers are expected to have measures in place to prevent any form of abuse of power, nepotism, bribery, and fraud.

2.1 Conflict of interest, gifts, hospitality and improper payments

Business decisions are made in the best interest of the companies involved, i.e., Suppliers and Our company. All parties are required to avoid any situation where personal interest conflicts or appears to conflict with company interests.

Actions by an individual to influence a company decision that may result in personal gain or gain for a family member or someone else close to the individual are not tolerated. This includes any form of improper payments or benefits (e.g., favors, gifts, hospitality, kickbacks), irrespective of the amount, that may be perceived as influence, or attempt to influence, a decision or a transaction. This applies even when accepted by law and irrespective of whether such incentives are provided directly or indirectly through a third party – such as supplier's own agents, suppliers, business partners or consultants – or in the form of a sponsorship or donation.

Offering and accepting gifts, hospitality and business courtesies can only be accepted if they are minimal in value and frequency, and if the time and place are appropriate and proportionate in the context of business activities. Suppliers are obliged to maintain adequate controls to comply with applicable laws and regulations related to restrictions on offering anything of value to government and public sector officials or employees.

2.2 Fraud

Suppliers abide by all applicable national and international regulations aiming at preventing, detecting, and remedying economic crime, including fraud, unlawful release of protected information, extortion, money laundering and other related crimes. This includes having controls in place to prevent financial transactions with any company or subsidiary suspected of supporting terrorist activities or money laundering. Suppliers are also responsible for ensuring that their employees refrain from any act or omission in connection to such criminal activities and actively cooperate with any inquiry in relation to such crimes.

2.3 Trade compliance

Suppliers ensure that their business practices comply with all applicable trade laws and regulations, including export controls, trade restrictions, trade embargoes, economic sanctions, and boycotts. Suppliers are responsible for obtaining export licenses and consents, where necessary, and warrant that they or their shareholders are not subject to any economic or administrative sanctions.

2.4 Safeguarding Our company's assets

Suppliers are responsible for using our company's brand as well as any tangible and intangible assets made available to them only for legitimate business purposes and for protecting them from loss, damage, or unauthorized use.

Our company's 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, Suppliers are expected to respect the intellectual property rights and trade secrets of others and ensuring that infringement upon such rights is avoided.

2.5 Security

Building on a strong security culture, Suppliers have a responsibility to safeguard the integrity, effectiveness and availability of their products and services. In maintaining a secure environment for their employees, partners and customers, Suppliers are expected to enforce measures to protect sensitive information, prevent unauthorized access or misuse, limit the access to information based on role-based access control principles and uphold the integrity of systems and data according to applicable laws and regulations including NIS2.

In particular, Suppliers have a duty to protect the integrity and security of our company information gained through interactions with our company in accordance with applicable laws, regulations, contractual clauses.

This duty of confidentiality applies even after the termination of a supplier agreement, in accordance with the locally applicable periods. Suppliers have the responsibility to securely dispose or return all the information and IT assets after contract termination and decommissioning of any access privileges and credentials after the termination.

2.6 Privacy

Suppliers are expected to respect and safeguard individuals' right to privacy and process personal data for all their employees, customers, suppliers, partners and other stakeholders, in a lawful, fair and transparent manner and protected from unauthorized access or unintended disclosure. As such, any processing of personal data is limited in scope and duration to what is deemed necessary and in accordance with applicable data protection legislation, including GDPR.

2.7 Responsible AI

Suppliers comply with applicable laws and regulations in the development, deployment and utilization of Artificial Intelligence, Machine Learning, Autonomous and Intelligent Systems or similar technologies (collectively "AI solutions") for or with our company or in development, deployment or utilization within their own operations. Suppliers are also expected to align their responsible practices to applicable legal and regulatory frameworks, including EU AI Act.

2.8 Insurance coverage

The Supplier is obliged to retain accurate and complete insurance schemes covering its operations, services and products.

2.9 Sourcing of minerals

Our company expects that the Supplier supports ethical, environmental and socially responsible sourcing of all minerals. Supply chains that either directly or indirectly contribute to conflicts, serious human rights violations, and negative environmental impacts are unacceptable to our company.

Arbitrary disengagement from conflict areas may cause negative consequences to the local population and that is why our company expects Suppliers to adhere to ethical sourcing practices and responsible exit procedures from suppliers that source minerals from these areas.

3 Respect for others is fundamental

Building on the company's core values of openness, trust and diversity, our company treats employees, suppliers, partners and stakeholders with dignity and respect. Likewise, our company expects actors in its value chain to share its support and respect to all internationally recognized human rights including 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.

3.1 Discrimination and equal opportunities

Suppliers promote a culture of equal opportunities and diversity, where fundamental human rights are known, understood, respected and applied equally to all Supplier's employees, whether temporarily or permanently hired or contracted.

Suppliers treat people on equal terms and do not allow any discrimination on the basis of, e.g., 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.

3.2 Forced labour

Suppliers oppose all forms of modern slavery such as compulsory, bonded, or forced labor, including trafficking. Any employment relationship with a given Supplier is freely chosen and free from threats. Employees are always free to leave their employment after the specified notice period.

3.3 Child labour

Suppliers uphold international and local child-labor standards across all our businesses and prohibit employment of any person under 15 years of age or below the country's legal minimum age. Persons under the age of 18 do not perform any hazardous work, including but not limited to exposure to physical or psychological stress in alignment with the UN Convention on the Rights of the Children, article 32.

3.4 Freedom of association and the right to collective bargaining

Suppliers support freedom of association and the right to collective bargaining, and all their 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. Suppliers do not interfere or in any way obstruct employees' freedom of association, or the right not to join an organization. Employee representatives are allowed to carry out their functions unhindered in the workplace.



3.5 Fair employment conditions

Suppliers promote secure employment and respect and uphold employees' right to fair and favorable working conditions.

As a responsible employer and business partner, Suppliers respect fair and reasonable compensation principles. This means paying a living wage or compensating in line with industry standards – whichever is higher and refraining from deductions from fixed salaries or wages as a disciplinary.

Employees with the same qualifications, experience and performance have the right to equal pay for equal work with respect to their relevant comparators regardless of any diversity aspects, e.g., gender.

Suppliers 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.

3.6 Health and Safety

Suppliers promote good health and a safe working environment in compliance with internationally recognized standards. This includes having mechanisms to control hazards, taking necessary precautions to prevent accidents and occupational diseases, and providing a working environment free from all forms of bullying, harassment, and acts of violence.

3.7 Reporting concerns and breaches

Suppliers are committed to a culture where their employees feel comfortable raising concerns and report suspected violations, without fear for retaliation.

4 Act responsibly in the marketplace

Suppliers are expected to treat everyone in the marketplace with the same ethical standards as they treat their own colleagues and act responsibly across their value chain.

This includes promoting ethical business practices, resource efficiency, and minimizing environmental harm throughout the supply chain.

4.1 Responsible deliveries

Suppliers are expected to take a lifecycle approach, from development, usage and relevant end of life treatment of their products and services, considering both normal usage as well as cases of potential misuse. This includes promoting circularity and working actively to mitigate any potential risks to human rights, including risks to the right for privacy and non-discrimination as well as risks to the environment.

4.2 Political activity

Suppliers are prohibited from using our company name, or any resources controlled by our company, to promote the views or interests of political parties or candidates.

4.3 Fair competition

Suppliers abide by antitrust and competition laws and regulations. Suppliers have rules and procedures in place to refrain from causing or contributing 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.

4.4 Stakeholder relations

Suppliers select and treat their customers, and their own suppliers impartially and fairly and only engage with public authorities in an appropriate and transparent manner.

Suppliers communicate reliable and correct information and ensure that communication with media, including social media, public or financial markets, is performed according to professional and ethical standards.

4.5 Environment

Suppliers are expected to follow responsible environmental practices across their value chain by having an environmental management system suitable for the risk landscape of their operations.

Suppliers are expected to publicly commit (Science Based Targets) to reduce greenhouse gas emissions in alignment with the latest scientific guidelines, which aim to limit global warming to 1,5 degrees Celsius above pre-industrial levels.

In line with a precautionary approach, suppliers are expected to apply the principles of circular economy including a whole lifecycle perspective in design, manufacture, transport, recycling and disposal. All waste must be handled without harming the environment and wasting resources.

5 Transparency and reporting of suspected violations

Suppliers are expected to provide our company with access to relevant premises and documentation to verify that the Supplier, its employees, relevant affiliated companies, and subcontractors adhere to this Supplier Code. Suppliers are expected to demonstrate compliance through periodic audits, risk assessments, and certifications and encourage a culture of compliance by integrating transparency principles into Suppliers' onboarding and training processes.

If a given Supplier finds any obstacles in meeting the requirements or finds any breaches, they are required to report them immediately to the Supplier's main contact in our company.

If a given Supplier has access to our company or its customers' data or systems, then the Suppliers are expected to establish incident response practices and notify our company promptly of any security or data privacy related breaches.

Suppliers may also report suspected violations of this Supplier Code or other unethical conduct confidentially and anonymously through our company Whistleblowing Channel available at <https://techservices.integrityline.com/>

Actions inconsistent with the Supplier Code must be promptly corrected and may be subject to sanctions. In the event of a material breach, our company is entitled to terminate the agreement with immediate effect.



5.1 Governing data

Document Owner

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2025-06-02

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References

5.2 Change history

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1.0	2025-08-11	Milla Kivioja	Monica Derksen	Satu Kiiskinen	First version

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

