Code of Conduct

We commit to these statements.

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Last reviewed October 2026



"All Etteplan's employees and partners are expected to comply with these principles and practices."

Our commitment to high standards

Dear Etteplan colleague and partner,

Since our founding in 1983 by four engineering entrepreneurs, we have grown from a local 'startup' to a successful international company. We operate in several countries, provide services for customers in various industries, work with a wide range of valued partners, and are actively involved in acquisitions of other companies. Our aim is to promote best practices across all our areas of operation. To that end, acting in an ethical and responsible manner requires that every employee, manager, and partner understands our commitments and follows these standards.

Our ambition is to set a new benchmark for industry excellence – to 'out-behave' the competition through our commitment to the highest standards. This also entails having the courage to acknowledge our missteps and taking it upon ourselves to learn from them with a forward-focused mindset. It's also worth emphasizing that, as stated in our purpose, changing things for the better is our driving force in everything we design, build, and solve. Our Code of Conduct plays a key role in ensuring that we fulfill this purpose.

Ethical and responsible business conduct, as well as a good reputation, supports Etteplan's strategy and brand and is crucial in ensuring our long-term financial returns. Our conduct and reputation help us meet society's expectations and help us build greater loyalty and trust among employees, shareholders, partners, other stakeholders, and the communities in which Etteplan operates around the world. We want our customers, our partners, and our employees to be truly proud to work with us.

This updated Code of Conduct is a set of guidelines that helps us clearly define our behavior and business dealings with internal and external stakeholders. It aims to clarify our commitments and provide practical guidance for our everyday work and decision-making. All Etteplan employees and partners are expected to comply with these principles and practices. Our collective success and reputation depend on each and every one of us. Therefore, I urge you to read the Code of Conduct and apply it to your daily work, so that we can fulfill our purpose of bringing people and technology together to change things for the better.

Juha Näkki
President and CEO
Etteplan

Our Code of Conduct explained

Purpose

We bring people and technology together to change things for the better. We are a no-nonsense business where technologies and solutions are complex, but our thinking is simple. Everything we design, build, and solve must change things for the better. This requires courage to work together, beyond boundaries. For us, better stands for change. Our work is only as good as the impact we create on our customers' business. Our customers' success is our success.

Scope and applicability

This Code of Conduct outlines the standards required for ethical business behavior for Etteplan's employees and partners ("partners" here also include our suppliers). "We" here refers to Etteplan, our employees, and our partners. The Code also provides practical help for putting these behaviors into action, as well as detailing useful contacts and channels for seeking help and reporting misconduct. The qualitative target is for the Code of Conduct to apply to all employees and other stakeholders.

This Code applies to all Etteplan companies and every employee in all areas of operation, including employees working at our customers' premises. This Code also applies to all our business partners and their employees. All our business partners should adopt and follow the principles of this Code. Customers, many of whom have set a Code of Conduct of their own, are also encouraged to act according to these same standards. In case of any disagreement between Etteplan's and our partners' Code of Conduct, where possible, a higher standard will apply.

Implementation and responsibilities

This Code of Conduct has been developed in close collaboration with many Etteplan employees and approved by Etteplan Oyj's Board of Directors.

All employees must read and understand these principles and apply them to their daily work and decision-making. This document will also be part of every new employee's onboarding program. Employees must also seek guidance or further clarification, if necessary, report any concerns or misconduct, refrain from retaliating against anyone who raises a concern, and cooperate in any potential investigations. Managers have a wider responsibility of setting an example with their own actions, ensuring that local guidance is in line with this Code, taking proactive steps to reduce any potential risks within their teams, regularly discussing these Code of Conduct topics, and ensuring that employees feel comfortable raising any concerns they might have.

It is important to understand that breaches of this Code of Conduct may carry serious consequences. This is why it is important to seek help and advice whenever you feel unsure of what the best way to act might be. We expect our partners to comply with and reach the standards in this Code of Conduct.

Etteplan’s commitments



We follow laws and regulations



We support fair competition



We protect our assets



We reveal conflicts of interest



We respond to fraud immediately



We safeguard data



We do not misuse insider information



We do not tolerate bribery or corruption



We do not give or accept excessive gifts



We engage appropriately in public discussion



We strive for high quality



We are committed to environmental responsibility



We do not discriminate or mistreat anyone



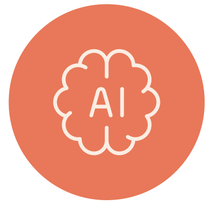
We invest in the well-being of our employees



We respect human rights



We collaborate with our partners



We use AI responsibly

We follow laws and regulations

At Etteplan, we are committed to complying with all local, national, and international laws and regulations in the countries where we do business and provide services. This includes abiding by all relevant export controls, trade restrictions, trade embargoes, economic sanctions, and boycotts. We actively follow legal developments and never knowingly advise anyone to act against any laws or regulations, and we expect high ethical standards from our business partners. Legal compliance only sets the baseline level for our operations, and we always strive to go beyond the bare minimum and establish best practices in all areas of operation.

We have developed several internal policies and detailed standard operating procedures to ensure that the highest standards of responsible conduct and good corporate governance practices are utilized throughout the organization. In the event of any disagreement between mandatory law and the statements contained in this Code, where possible, a higher standard will apply. Etteplan's ESG (Environment, Social, Governance) follows the standards according to the CSRD (Corporate Sustainability Reporting Directive) and is committed to the 10 principles set by the UN Global Compact.

The do's & don'ts

- Aim to follow the latest developments and regulatory discussions in your area (if part of your job description) and prepare for any expected or confirmed changes.
- Ask your supervisor or other relevant personnel at Etteplan whenever you are unsure of any legal issues or developments.
- If you are an Etteplan employee, please refer to the various policies found on Etteplan's intranet.

We support fair competition

We support free markets and effective competition, and we do not take part in any activities that hinder either of them. We firmly believe that fair competition is in the best interest of our company, our customers, our partners, and all other stakeholders, as well as society as a whole. We comply with competition and antitrust laws which prohibit anti-competitive agreements, abuse of market power, and anti-competitive mergers and acquisitions. Violating such regulations not only harms Etteplan's reputation but can also lead to serious consequences. We will never discuss business secrets with competitors or engage in agreements concerning market share, prices, production restrictions, or any other factors that could restrict fair competition.

The do's & don'ts

- Familiarize yourself with competition legislation in your country.
- Don't discuss pricing, customers, market share, or other business secrets with competitors.
- Don't enter into any agreement with any known competitor that could potentially be seen to restrict free market competition.
- If another party suggests any of the above, notify your supervisor.
- If you are still unsure about these commitments and about how to proceed, please talk to your supervisor or refer to the contacts section provided at the end of this document.

We protect our assets

Throughout Etteplan, we firmly commit to safeguarding our intellectual property (IP) and other company assets, both tangible and intangible. Tangible (or physical) assets owned by the company include hardware, real estate, and office equipment, while intangible assets include electronic information, brands, patents, copyrights, and trade secrets. As a company, we safeguard information, technology, and other company assets from unauthorized use, misuse, loss, or theft. Furthermore, we always strive to use digital communication technology responsibly and professionally. We also respect the intellectual property held by others and we never access IP by improper or illegal means. Security risks are identified and assessed as part of the group risk management process. Taking or misusing company property or assets without the correct authorization may constitute theft.

The do's & don'ts

- Protect company computers, phones, and any other assets from damage, loss, theft, or misuse.
- Use company assets only for work-related purposes unless otherwise agreed, and don't use them for inappropriate or illegal activities.
- Consider carefully before downloading or sharing content that could possibly be threatening to our operations.
- Use brand, patents, trademarks, software, and copyrights only as instructed.
- For more information, please refer to Etteplan's Information Security Policy.

We reveal conflicts of interest

We believe that revealing any situation that may lead to a potential conflict of interest is very important. A conflict of interest may arise when the company and an employee's personal interests collide, or when an employee might have loyalties that are different from those of the company. We always aim to avoid competing interests and to make decisions that are best for the company. We don't let our personal interests and relationships influence the decisions we make. A possible conflict of interest only becomes a potential problem if it is not properly disclosed and managed. Therefore, it is important to be open and transparent in all situations where an employee or stakeholder could potentially be tempted to act in their interest rather than that of the company.

The do's & don'ts

- Reveal to your supervisor any involvement in companies that could potentially impact Etteplan's or our partners' business.
- Consult with your supervisor if you are involved in supply partner selection, choosing charitable causes, or any other situation regarding decisions concerning companies or organizations where you, your family member, or a close friend, hold a position of responsibility or have a financial or other interest.
- Remember that no reporting relationships are allowed between individuals who are related or intimately involved.

We respond to fraud immediately

Etteplan condemns all irregular ways of obtaining business or personal advantages and will act immediately to investigate any suspected cases of fraud and will forward the relevant information to the correct authorities if needed. Fraud can be described as the deliberate attempt to obtain certain benefits from the company, a third party (such as a competitor, customer, partner, tax authorities, etc.), or a person, by dishonest means. This can include falsifying receipts or documents, falsely claiming tax-exempt allowances, or misrepresenting yourself (for example, by adding incorrect information on your CV) or the company to gain financial or other benefits. Any benefit gained through illegal or improper means is prohibited.

The do's & don'ts

- Be honest and open in your dealings both with Etteplan and others.
- Report any suspicion of fraudulent or dishonest behavior.
- Ensure controls are up to date in your field of work to help identify fraud and theft.
- Be vigilant and ensure invoices, receipts, and other paperwork are genuine and correct.
- In exceptional cases where you have been unable to obtain an actual receipt, don't submit a false receipt. Instead, inform the company of the reasons for the missing receipt. The company will do its best to reimburse you in case of a genuine and acceptable expense.

We safeguard data

We respect the privacy of our customers and other third parties, particularly the secrecy of confidential information and the high level of security required for data protection. Privacy violations can prove very costly, both in terms of financial costs and in terms of loss of public trust. At Etteplan, we exercise considerable care with regard to all the data that we both collect and have access to, processing it in a manner that does not jeopardize privacy. We only collect data that is needed for us to provide our services and this data is always processed in a lawful manner. Employees can only have access to confidential data if it is explicitly required as part of their work and may not disclose information they have accessed without justification. We have achieved ISO 27001 certification, which means that we have a consistent and preventive way of managing information security threats and safeguarding data and assets. Public authorities may, however, sometimes have a legal right to access information.

The do's & don'ts

- Only collect, store, access, or use confidential data if it is required as part of your job and for a business purpose.
- Don't disclose confidential data to those who do not need it within the organization and never to any unauthorized person outside the organization.
- Don't leave confidential material on your desk or in the printing room and always properly destroy any unnecessary confidential data, whether physical or digital.
- Ensure that any business-critical information is appropriately and correctly stored and shared only in a protected environment.
- Note that data laws, regulations and directives may apply when transferring personal data across countries.
- For more information, please refer to Etteplan's Information Security Policy as well as our internal and external privacy statements. **etteplan.com/privacy-statement/**

We do not misuse insider information

Etteplan is a publicly listed company, and we are committed to complying with insider regulations. Employees are prohibited from profiting in the stock market by exploiting unequal access to information. Insider information refers to non-public information that could provide a financial advantage when used to trade in Etteplan's or another company's securities or shares. The use of insider information is a criminal offense, and you may not use information that is not already in the public domain or pass on that information to any third party either. If you have been notified that you have been added to your employer's insider register, you cannot trade in Etteplan stocks or advise anyone else to do so during the given time frame.

The do's & don'ts

- Don't engage in any stock trading activities based on non-public information you obtained at work, which may affect stock prices once published.
- Don't share non-public information with anyone who might use it in trading stocks or recommend Etteplan stock to anyone based on unpublished information.
- Don't engage in any trading activities when you have access to insider information, especially immediately prior to financial statement releases or major announcements, or while you are officially registered as an insider.

We do not tolerate bribery or corruption

We have a zero-tolerance policy for any form of bribery or corruption, including money laundering. Bribery refers to the offering, giving, receiving, or soliciting of something of value to deliberately influence decision-making. We don't give or accept bribes in any form, and we don't offer advice to any third party to do so on our behalf. Corruption often refers to the abuse of power for private gain or describes situations where dishonest conduct is carried out by those in a position of power, such as authorities or managers. We comply with anti-corruption laws and expect all our partners to do the same. At Etteplan, we don't attempt to influence decisions in any improper way and understand that questionable payments made by the company or any third party or agent acting on our behalf may lead to criminal prosecution personally and for the company. Anti-corruption/bribery measures are included in our Sustainability Agenda, which you can read more about at **etteplan.com/about-us/sustainability/**

The do's & don'ts

- Don't offer or accept money or other benefits (such as vouchers or "red envelopes") to obtain or retain business or instruct anyone else to do so on your own or the company's behalf.
- Don't make payments to business partners that are not specified in the contract.
- Don't offer payments or favors to facilitate decisions made by government officials, authorities or others.
- Be particularly vigilant when doing business in countries that are known to have a high risk of corruption.

We do not give or accept excessive gifts

At Etteplan, we only give and accept gifts of low real value or cost and provide only reasonable hospitality to our partners. Personal gifts should be suitable for the occasion and Etteplan's policy is that gifts should not exceed a reasonable monetary equivalent. Business dinners are allowed, but the hospitality provided should not be excessive. Both gifts and hospitality should be seen as occasional and not regular occurrences, and should not contain any expectations of returning favors. In some situations, where the giving of gifts could be interpreted as trying to influence company decision-making, gifts should not be given at all. We also understand that some of our customers, partners, local customs authorities, or national tax authorities may have even stricter standards regarding hospitality and the giving of gifts and we aim to respect these standards.

The do's & don'ts

- Don't give any gifts in exchange for any other benefit.
- Only give and accept occasional non-cash gifts or hospitality that is appropriate.
- Don't give any gifts to potential business partners during negotiations.
- Politely decline any gifts that exceed our policy and explain it is based on company rules. If refusing a gift might offend your host, consult your supervisor.
- If you are participating in an event abroad, your employer should cover all significant costs, such as flights, accommodation, and event fees – at the same time, don't offer to pay these travel costs for our business partners.
- If you are at all uncertain about any issues related to giving and accepting gifts, please contact your supervisor.

We engage appropriately in public discussion

We want to play a positive role in the world, support various causes that are important to us, and encourage our employees to be active and contributing members of society. We support open public discussion of our work on a general level, including on social media, as this is important for our visibility and attractiveness as an employer. We must also safeguard Etteplan's reputation and are expected to communicate and behave in ways that reflect our brand values. It is essential that we always take confidentiality clauses and insider regulations into consideration, and never publicly state things that may jeopardize customer relations or company business secrecy, or indeed break non-disclosure agreements. We must also avoid offending or disrespecting others, and refrain from participating in events that may be deemed inappropriate, such as those that contradict human rights.

The do's & don'ts

- Respect the privacy of your fellow employees, customers, and partners, safeguard company business secrets and don't share confidential or personal information or images without proper authorization.
- Remember that in general, political activity and allegiances should be kept separate from work and should not affect your work time or work relationships. Exercise caution and diplomacy in dealing with or commenting on sensitive topics.
- Refrain from criticizing companies or private persons publicly. Disagreements should be handled appropriately and in private. You may, however, like and even share our competitors' social media posts.
- When you are unsure about whether a social media post or other public commentary is appropriate, refrain from commenting, and refer to the company's social media guidelines, or ask Marketing and Communications personnel for guidance.

We strive for high quality

We attract and develop skilled and motivated professionals to collaborate with our customers and establish sustainable partnerships. We ensure timely delivery of our high-quality design work that meets all customer requirements. Our goal is to add significant value for our customers and help improve their business. With our customer-centric mindset and dedication to environmental sustainability and robust information security, we strive for high quality in all our service solutions.

While continuously enhancing our processes, tools, and methods, we ensure that our management system complies with ISO 9001, 14001, 27001, and 13485 management system standards. We expect all our employees to follow the management system principles and encourage our partners to maintain certified management systems.

The do's & don'ts

- Follow the processes, guidelines, and instructions of the management systems.
- Strive to promote continuous improvement in our operations.
- Report any non-conformities.
- Take advantage of relevant and suitable training opportunities when available.
- Don't use unofficial processes if there are published group-level processes available.
- Don't fear or hide mistakes: embrace and learn from them.

We are committed to environmental responsibility

We are aware of the environmental impact of our activities and understand that the products and services we design can have an impact on the environment and the climate. Etteplan operates according to the requirements set by legislation, and commitments set in our environmental management system, as well as the requirements in the ISO 14001 standard and the 10 principles of the UN Global Compact. We encourage all our employees, customers, and partners to consider environmental aspects, including applying life cycle thinking in the design phase and selecting suppliers or sub-suppliers that are environmentally conscious and have plans for improvement. We support sustainable solutions that reduce our emissions. Our target is the reduction of scope 1 and 2 emissions by 42% by 2030. We also aim to minimize waste and the use of chemicals and water.

The do's & don'ts

- Do your part to reduce emissions, fight climate change, be energy efficient, and consider how natural resources can be saved at the office, at home, and during travel.
- Consider the whole life cycle of products and aim to deliver services and solutions that are as environmentally friendly as possible. Life cycle should be considered in both internal use of products and within services and solutions for customers.
- Where and when possible, ask questions about a partner's environmental practices and consider this topic when making decisions regarding new partners.
- In order to reduce emissions, be open to continuously reviewing and changing our ways of working, thereby helping Etteplan to become a more environmentally conscious organization.

We do not discriminate or mistreat anyone

We are committed to treating people with respect, regardless of race, religion, gender, political opinion, age, nationality, sexual orientation, civil status, disability, or any other condition or affiliation. We do not accept discrimination, or hostile or abusive behavior on any grounds. We aim to provide a workplace where people can feel comfortable to be themselves and can work free from harassment or bullying of any kind, whether physical, emotional, or sexual. All current and potential employees are evaluated based on their skills and have equal opportunities for employment and job advancement, and the company is committed to providing equal pay for equal work. We pay fair and adequate wages that meet or exceed legal and collective agreement requirements and reflect the work performed. However, the company may take proportionate positive action to provide a more equal footing to those groups of people who are currently underrepresented or at a disadvantage. Etteplan is also committed to diversity, equity, and inclusion (DEI) and we aim for continuous training and development within this topic.

The do's & don'ts

- Having fun at work is great, as long as it is not at others' expense: avoid making comments or jokes that may be seen as inappropriate (e.g., sexist, racist) or likely to offend.
- Sometimes, people may not realize their words are hurtful. If you feel uncomfortable, politely address their behavior directly and in private.
- Don't ask about someone's family plans or relationships in interviews, or let such matters influence your decisions.
- Build a team of individuals from different backgrounds and skills, and be aware of unconscious biases.
- If you feel subjected to unfair treatment, or witness blatant discrimination by an Etteplan employee, manager, customer, or partner, report it.
- Employees can read more about career advancement in the Career Model on our intranet.

We invest in the well-being of our employees

Highly motivated and competent people are our most important asset and an essential requirement for our existence, growth, and development. One of management's most important duties is to take care of employees' safety, well-being, motivational development, competence, and to set clear targets. Our Professional Development Process and Career model aims to support employees in continuously developing their professional skills. We take measures to ensure a good work-life balance, that our workplace is safe. We comply with applicable laws and agreements on working hours, rest periods, overtime, and other relevant health and safety laws. We provide the benefits set out in local legislation, collective agreements, and employment contracts. We also encourage our employees to take measures to eliminate hazards and prevent occupational illness and injury in the office and during the daily commute as well as have a safety mindset during off-work hours. During official work events, employees should exercise good judgment and appropriate behavior. Consuming or possessing illegal drugs or being under the influence of drugs or alcohol at work is not permitted.

The do's & don'ts

- Use equipment at work appropriately and take the necessary measures to avoid work-related injuries for example related to ergonomics.
- Take an active role in your well-being and ensure you lead a balanced and active life.
- Participate in company events designed to enhance your well-being, including stress management.
- Report all incidents, near misses, or perceived risks according to company instructions.
- We promote the use of a safety mindset both during and outside working hours.
- Agree flexible or hybrid work arrangements with your supervisor in line with local guidance. Do not work or expect others to work beyond agreed hours without following the overtime rules.

We respect human rights

Etteplan respects all internationally recognized human rights, including those in the International Bill of Human Rights, and the ILO's* Declaration on Fundamental Principles and Rights at Work. Local legislation and agreements apply to working hours, overtime, adequate wages, benefits, and flexible work where we operate. Where this Code sets a higher standard, it applies. We are also committed to the UN Guiding Principles on Business and Human Rights and the UN Global Compact. We take responsibility to ensure that we do not infringe on human rights, and take action to uphold and respect these rights, addressing any potential violations.

This also includes human rights within the supply chain and through the end use of our products or services. We follow labor laws and agreements and, under no circumstances shall we accept any threats, harassment, or negative consequences to employees who aim to organize themselves or solicit better working conditions. We conduct regular human rights due diligence, to identify, prevent, and mitigate human rights impacts and prepare for possible corrective actions, focusing on the most salient human rights topics. We strictly prohibit the use of child labor in any form, as well as human trafficking, forced labor and slavery.

The do's & don'ts

- Managers have a responsibility to create an open and safe working environment where employees feel comfortable raising concerns.
- Managers have a responsibility to ensure working conditions, including working hours, overtime, wages, and benefits, are in line with national and international law.
- Respect employees' right to freedom of association and collective bargaining and ensure employees who exercise these rights do not face any negative consequences.
- Request that our partners respect human rights and consider social factors when selecting partners.
- Refer to Human Resources regarding any questions about your employment conditions.

* International Labour Organization

We collaborate with our partners

Etteplan works with thousands of different suppliers, subcontractors, and other stakeholders of different sizes, realities, and abilities. We view all of our suppliers as our partners, treat them with respect, openness, and honesty and we expect the same in return. We request that our partners subscribe to this Code or follow their own Code if it is of a more stringent standard. Our suppliers and subcontractors must also comply with local legislation in all the countries they operate in. Etteplan is committed to playing its role in improving responsible supply chain management and traceability. Etteplan is committed to ensuring the health, safety, and protection of people who come into contact with our products and business. For this reason, we require high social, environmental, and human rights standards also among our partners. We expect our partners to ensure appropriate due diligence in their sourcing practices to guarantee compliance with applicable legislation.

The do's & don'ts

- Familiarize yourself with relevant legislation (e.g., relating to conflict minerals) and also with the **Etteplan Responsible Minerals Sourcing Policy**.
- Make sure that direct suppliers' conflict minerals due diligence processes have been validated by an independent third-party audit program.
- Ensure that suppliers are aware of Etteplan's Code of Conduct, Etteplan's Supplier Code of Conduct, and review their own Code to see if it meets or exceeds the requirements.
- As Etteplan's partner, please be open with your challenges and we will try to work together to find solutions.
- Contact Etteplan's supply managers and purchasers for any questions regarding partners.

We use AI responsibly

AI helps us work more efficiently and deliver value to our customers. We are committed to using it in a compliant, ethical, and safe way. Our work using AI is guided by transparency, accountability, and data privacy.

We use only AI tools approved by Etteplan, through Etteplan's enterprise accounts, and we never enter data into public or unapproved tools. We classify our data first, use only what the task needs, and check that customer agreements allow AI processing.

AI complements human expertise and does not replace it. A human checks and verifies everything AI produces, and the person who uses AI is responsible for the content. AI does not make decisions about people.

When AI is part of a deliverable or solution for a customer, we apply the same quality management and security requirements as in all our work. We comply with applicable laws, including the EU AI Act, and follow project disclosure requirements.

The do's & don'ts

- Use only AI tools approved by Etteplan, and only through Etteplan's enterprise accounts. Don't use personal AI accounts for work.
- Never enter Etteplan or customer data into public or unapproved AI tools. Classify your data first, use only what the task needs, and never enter credentials, special category personal data, or data restricted by a customer agreement.
- Before using customer data, check that the customer agreement and NDA allow AI processing.
- Check and verify everything AI produces before you use or share it. You are responsible for it.
- Add your own contribution to AI-generated work.
- Report AI risks, near misses, and incidents in the internal Incident tool. Report AI misuse or ethical concerns through the whistleblowing service.
- If you are unsure whether an AI tool or use is allowed, ask your supervisor or IT. For more information, please refer to Etteplan's Artificial Intelligence Policy and AI Data Usage Guidelines on the intranet.

Be vigilant

We urge our employees to actively seek advice or clarification on any questions regarding this Code of Conduct or how to act in any given situation. Employees are required to report suspected violations to the below-mentioned contacts or channels. Stakeholders are also encouraged to voice their concerns and to contact us when they have questions, require clarification regarding this Code, or have experienced any suspected violation. All reported cases will be taken seriously, investigated, and resolved appropriately.

Always ask yourself:

*Is this action or decision **legal and in line with our values** and set of company beliefs?*

*Is this in the **best interest** of our company and stakeholders?*

*Can I **proudly and correctly stand behind** this decision?*

Reporting misconduct and seeking advice

You have several options and channels for action:

1. If you are an Etteplan employee, you can always speak to your supervisor or the supervisor of the person(s) suspected of non-compliant behavior. They are there to tackle any misuse or perceived bad behavior in the company.
2. If you wish, you can also speak to Etteplan's Senior Vice President, Human Resources.
3. Regarding the use of social media or public discussion, please contact Etteplan's Senior Vice President, Marketing and Communications.

If you feel uncomfortable speaking or writing to any of the above:

4. You may also leave a message on our whistleblowing tool. Whistleblowing is a service that enables anyone to voice concerns or report non-compliance in confidence. It provides the option of anonymity while enabling communication with the person voicing a concern or reporting non-compliant behavior. All reports submitted to the whistleblowing tool are treated with care and processed in a safe and secure environment. You can leave your contact details or share your concerns anonymously.

You can report an offense using the whistleblowing tool which can be found on our website at **etteplan.com/about-us/sustainability/code-of-conduct/** and our intranet.

If you are Etteplan's partner, customer, or other external stakeholder, and you have a concern about the activity or behavior of Etteplan's employees or leadership, you may also use the whistleblowing tool (above) or contact Etteplan's Human Resources.

Whistleblowing protection

We have zero tolerance for any form of retaliation of any kind against individuals who voice their concerns, report misconduct, or assist in investigations of possible violations. We will ensure complete confidentiality for anyone reporting suspected violations. There will be no retribution or punishment for any individual who reports a suspected violation in good faith, even if this claim is later found to be without merit.

All whistleblower reports are processed following the EU's Whistleblower Directive by the Senior Vice President for Human Resources, the Chief Financial Officer, and the HR Director of the company's Finnish operations.

However, it is also important to understand that presenting an accusation made with malicious intent, or that you know to be false, is also an offense and may have consequences.

*This **Code of Conduct** has been written to help everyone who either works at or with Etteplan to better understand the rules required for personal and professional conduct. Together, we can ensure that our behavior is following this Code and that we find the best solutions to any possible dilemma. If you have any questions at all related to this document and the subject matter it contains, please feel free to ask!*