

Efima's ethical principles, Code of Conduct

Introduction

These Code of Conduct principles compile the key operating principles essential to Efima's operations, ensuring compliance, professionalism, and ethical conduct. All employees of the Efima Group are required to commit to following these principles in their work. The CEO approves and, when necessary, reviews the contents of the Code of Conduct document.

We operate in accordance with our values, guidelines, and legislation

We perform important and meaningful work. Therefore, our operations are also guided by our values:

- Together for better
- Come as you are
- Desire to listen
- Achieving with skill

The realization of our values is reflected in our everyday work and actions.

Efima's way of operating in accordance with regulations and its values is largely described in these Code of Conduct principles. Daily work at Efima is further guided by more detailed internal company-level instructions. Every Efima employee must follow the principles set out in the Code of Conduct and other internal guidelines. By acting in accordance with these ethical principles, applicable external regulations, and internal guidelines, we ensure that Efima's operations meet all requirements placed upon it. In doing so, we strengthen the trust of our customers and other stakeholders. These principles support business success and the pursuit of effective operations. They are part of Efima's corporate culture.

We comply with all laws, regulations, and official requirements governing our operations and act honestly, sincerely, and without discrimination both within the Group and in our relationships with customers, authorities, and other stakeholders. We follow applicable regulations in all our activities and monitor changes in legislation. We require our employees and partners to comply with legislation in all situations.

Human rights and non-discrimination

We treat each other, our business partners, and other stakeholders fairly and equally, regardless of age, origin, gender, nationality, language, religion, beliefs, opinions, political activity, trade union activity, family relationships, health status, disability, sexual orientation, or any other personal characteristic.

We respect human rights in all our operations and strive to promote their realization within our sphere of influence. We treat everyone equally and with respect. We do not accept discrimination, nor do we use child labor or forced labor.

Our principles are based on the ten principles of the UN Global Compact initiative.

We maintain and promote a responsible and safe working environment

We aim to ensure a working environment that is both psychologically and physically safe for everyone. Experiences of equality and fairness strongly support the perception of a safe working environment. We also promote awareness and competence related to diversity and equality among all employees.

We do not tolerate bullying, harassment, discrimination, or other inappropriate behavior in our workplace. Established procedures are in place for handling situations involving inappropriate conduct. Whistleblowing channel is available for reporting discrimination or harassment, also anonymously if desired.

We ensure data protection and information security

Efima Group maintains and processes confidential information related to individuals and organizations. We handle confidential information in accordance with applicable legislation and protect privacy in the processing of personal data. We maintain employees' data protection competence through regular training and require heightened diligence in handling information related to customers, employees, Efima as a company, and its operations. Data protection plays a central role in all Efima operations and service development.

Information security is a key element of Efima's responsible business operations. We safeguard confidential customer data by ensuring its protection, accuracy, and availability. Information security is implemented in all areas of Efima's operations. Awareness and competence are maintained through regular training and active monitoring of the operating environment.

We comply with good sales practices

The services offered by the Efima Group are equitable and fair for companies of similar type and size within customer segments. We provide all information about products and services that may be relevant to a customer's decision-making. We do not provide false or misleading information about products, services, Efima as a company, or its competitors, nor do we engage in inappropriate or unethical practices.

We communicate openly and responsibly

Through open and active communication, we build trust in our industry, respond to the information needs of external and internal stakeholders, promote dialogue, and strengthen the customer experience. All communication follows Efima's values and is based on transparency. However, certain information is strictly confidential and must be handled appropriately. Confidential information includes, for example, customer data and trade secrets.

We identify and manage conflicts of interest

Identifying conflicts of interest to ensure they do not influence decision-making is part of the Efima Group's responsibility. A conflict of interest refers to a situation where the independence of decision-making could be compromised due to the personal interest of an individual involved in the decision-making process, their close

associates, or the organization they represent. Decision-making may also be compromised when Efima representatives, their close associates, or their affiliated organizations have external ties to a company that is a counterparty in a business transaction.

Conflicts of interest must be identified, and if they cannot be avoided, they must be managed using appropriate measures.

We do not accept corruption or bribery

We do not accept corruption or bribery in any form. Bribery is defined as the offering or acceptance of any gift, loan, payment, fee, or benefit intended to induce dishonest or unlawful action or a breach of trust in business operations. Bribery also includes the abuse of position or authority to gain personal advantage. We apply anti-bribery principles in all our business relationships and operations.

We consider the impact of our operations on the environment and society

We recognize climate change and biodiversity loss as major challenges of our time and aim to take actions in our own operations to mitigate them. We monitor our environmental impacts, particularly from the perspective of climate change. We require responsible conduct not only from ourselves but also from our partners and investment targets in terms of environmental, social, and governance aspects.

We conduct procurement responsibly

We make procurement decisions based on actual needs and market-based good practices. To ensure cost-effectiveness, we also tender our procurements. We consider factors such as good governance, environmental aspects, and human rights in our procurement decisions.

We require our suppliers, like Efima, to commit to responsible ethical practices, good business conduct, and compliance with legal obligations. Our business partners must, among other things, fulfill their employer responsibilities as well as obligations related to contracting and environmental responsibility.

Who can I contact?

Every Efima employee is responsible for understanding and complying with the Code of Conduct and related detailed rules and instructions. If you are unsure about the content or interpretation of the Code of Conduct, regulations, or internal guidelines, or if you suspect misconduct, contact your manager. You may also contact the People & Culture team.

Whistleblowing channel is also available, through which you can report suspected misconduct anonymously if you wish. All reports are handled confidentially in Efima, regardless of how you choose to report them. Separate whistleblowing guidelines and processing principles apply to the channel.