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Code of conduct

This Code of conduct serves as a guide for all Systam employees to uphold our strong commitment to integrity. Everyone must understand our Code and how it applies to everyday work. Alongside our values—trust, dare, and care—it steers us toward a sustainable future. Aligning our actions with these principles makes Systam a reliable employer, partner, supplier, and customer.

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1 We comply with laws and regulations

We are committed to complying with the applicable laws and regulations in the countries and regions where we operate. If local laws, regulations, or cultural practices differ from this Code of Conduct, the stricter of the two will be followed.

2 We are committed to honest and ethical business practices

In addition to complying with applicable laws and regulations, we operate following the principles of good business conduct. We conduct our business fairly and ethically, adhering to the highest standards of honesty and integrity. By fostering a culture of ethical behavior, we build trust with stakeholders, protect our reputation, and contribute positively to society and the environment.

3 We respect people and human rights

We promote and respect human rights in line with the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights, and treat our employees and those of our partners with respect and dignity.

We are committed to:

- Opposing any form of modern slavery, forced labor, child labor, and human trafficking.
- Providing our employees with a safe and healthy working environment.
- Ensuring that our employees understand the terms of their employment.
- Ensuring freedom of association and collective bargaining for our employees.
- Promoting equal career opportunities based on qualifications and business needs.
- Standing against all kinds of discrimination based on bias or prejudice, including but not limited to race, skin color, gender, sexual orientation, marital status, pregnancy, family relationships, religion, or similar factors.
- Condemning all threats of violence, physical punishment, physical or verbal abuse, or any other form of unlawful harassment.

Resources: Human rights policy

4 We have zero tolerance for corruption and bribery

We do not engage in illegal, regulatory-violating, or unethical business practices. Bribes or other unlawful financial benefits must not be offered, paid, or accepted under any circumstances, whether to authorities, customers, or other parties.

In particular, offering or accepting bribes, gifts, or services that exceed the norms of reasonable and customary hospitality is strictly prohibited.

We avoid conflicts of interest. We keep our personal interests separate from business decisions and do not let our personal relationships affect our work.

We make commercial decisions independently. We do not agree or coordinate with competitors on prices, discounts, bids, customers, markets, output or innovation, or engage in unlawful wage-fixing or no-poach arrangements. We do not exchange non-public competitively sensitive information, including future prices, bids, costs or commercial plans. These rules also apply to informal conversations, industry events and digital communications.

Before engaging in competitor cooperation, joint bids, benchmarking, or restrictive distribution arrangements, the responsible manager obtains competent advice when needed. We do not impose unlawful resale restrictions or abuse a dominant position. If a discussion becomes improper, employees must object, stop participating, preserve relevant records, and promptly inform the CEO. The CEO arranges independent advice and necessary follow-up.

Resources: Anti-corruption policy

5 We know our customers and partners

We build strong, transparent, and lasting relationships with our customers and partners by understanding their needs and expectations. We are committed to conducting business with honesty, fairness, and respect, ensuring that our interactions reflect our values.

We also expect our partners to uphold the same high standards of conduct that we follow. This includes complying with all applicable laws, ethical business practices, respecting human rights, and committing to environmental sustainability. Working together with shared principles ensures the integrity and reliability of our collaboration.

Resources: Supplier code of conduct

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6 We support sustainability and environmental responsibility

We are committed to reducing the environmental impact of our operations and complying with applicable environmental laws and regulations in every country where we operate.

In practice, environmental responsibility means understanding and minimizing the ecological effects of our activities. We take proactive steps to promote environmental responsibility.

We expect all our employees to be aware of environmental issues in their day-to-day work. That is why we expect everyone to act responsibly and share best practices.

Resources: Environmental policy

7 We value data privacy and security

We respect the privacy of our colleagues, customers, and other stakeholders and their representatives by handling personal data in compliance with relevant laws, such as GDPR (General Data Protection Regulation).

We protect confidential information and intellectual property from unauthorized disclosure, and all employees must complete annual training on secure passwords, phishing awareness, and device security. Training is verified with a test, and performance is recorded.

8 We work substance-free

We are dedicated to fostering a safe, productive, and healthy workplace for everyone. To ensure this, we maintain a substance-free environment where the use, possession, or influence of illegal drugs, alcohol, or other impairing substances during work hours is not permitted. Systam has operational guidelines in healthcare for the prevention of substance abuse.

We allow moderate alcohol consumption at company-sponsored after-work events, but we expect everyone to drink responsibly and avoid behavior that could harm our workplace culture or reputation.

9 We voice our concerns

Every employee must report any suspected or observed breach of the law, this Code of Conduct, or other Systam policies. Primarily, we encourage contacting one's immediate supervisor, another person in management, the occupational safety organization, a representative of the employee group, or the human resources department.

If an employee feels that it is not possible to report the matter with their name, they can also report it through Systam's anonymous reporting channel, remaining anonymous throughout the entire investigation. All reports and discussions are always treated with absolute confidentiality and thoroughness. Records are protected and accessible only to authorized persons.

The CEO ensures that employees know how to access the reporting channel and alternative contacts. Records are protected and accessible only to authorized persons.

Matters involving the CEO may be raised with an unconflicted Board member. Retaliation against anyone who raises an honest concern, seeks advice, or assists an investigation is prohibited, even when the concern is not substantiated. An unconflicted person assesses the concern, hears relevant parties, and records findings and corrective actions. The responsible manager checks that actions are completed and that retaliation has not occurred. Employees remain free to contact authorities, employee representatives or other legitimate external channels.

10 Management responsibility and implementation

The CEO and managers are responsible for implementing this Code within their respective areas of responsibility. The CEO retains overall accountability and ensures that sufficient resources, clear responsibilities and practical controls support every commitment.

Managers are responsible for applying this Code in day-to-day work, ensuring that their teams understand its requirements, providing guidance and monitoring compliance. They must promptly address concerns, implement corrective actions, and escalate significant issues to the CEO.

The CEO reviews implementation, significant concerns, and corrective actions with managers at least annually. Delegation does not remove the CEO's overall accountability or managers' responsibility for implementation within their own teams.

11 Training reporting and follow-up

Employees receive this Code and all referred policies during onboarding and a refresher at least annually. Training is verified with a test, and performance is recorded.

Approved by:

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CEO Systam Oy
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