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Human rights policy

We at Systam are committed to upholding and promoting human rights and ensuring fair and ethical labor practices in all aspects of our operations. This policy outlines our approach to respecting and supporting human rights, ensuring safe and fair working conditions, and fostering a culture of dignity and respect.

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1 Commitment to human rights

We at Systam promote and respect human rights in line with the Universal Declaration of Human Rights and United Nations Guiding Principles on Business and Human Rights, and treat our employees and those of our partners with respect and dignity. We are dedicated to maintaining fair, safe, and healthy working conditions for all our employees.

2 Child and forced labor

We do not employ children under the legal minimum age for employment. If no such age is defined, the minimum age is the age at which compulsory schooling is completed as mandated by law. Children above the minimum working age cannot be employed in hazardous work or work that could negatively affect their personal development.

We do not accept the use of any kind of modern slavery, such as forced labor or human trafficking, in any circumstances. Employees are free to terminate their employment following a reasonable notice period as stipulated by national legislation or agreements. Employees cannot be required to leave money or personal documents in the custody of their employer.

3 Fair hiring and voluntary employment

Managers define job-related selection criteria and assess candidates consistently. Before work begins, designated personnel verify age and lawful eligibility to work and provide clear written employment terms. Applicable law, collective agreement coverage, and contractual requirements are checked before terms are agreed. Recruitment must be free from discrimination, coercion, and worker-paid recruitment fees or related costs. If such fees have been charged in connection with our recruitment, we arrange reimbursement and address the cause.

4 Freedom of association and collective bargaining

We recognize the freedom of association for our employees and their right to select representatives of their choice and respect these rights. We also acknowledge the employees' right to collective bargaining.

5 Salary, benefits and working hours

Employees receive clear information on pay, payment dates, benefits, leave and working arrangements. Salary is paid accurately and on time, with an understandable payslip. Deductions require a lawful basis and must not be used as discipline. The designated personnel contact keeps the current benefit terms and eligibility criteria available to employees. Statutory and contractual entitlements are respected; additional benefits use objective, non-discriminatory criteria.

Working hours are agreed upon under national legislation. Employees must have at least one day off every seven days. We record and monitor employees' working hours and related compensation in accordance with applicable working time legislation. Overtime must be authorized and lawful.

Managers address repeated overtime and excessive workload by reviewing priorities, staffing, or deadlines. Flexible and remote work and global customer time zones do not remove working time and rest protections. At least annually, management reviews pay and benefit fairness and acts on unjustified differences.

6 Development representation and termination

Managers provide role-appropriate onboarding and hold a development discussion with each employee at least annually. Learning needs, agreed support and follow-up are recorded. Required policy, safety and role-specific training is provided, and completion is recorded. Training and career opportunities use objective criteria and reasonable adjustments where needed.

Before employer-initiated termination, lay-off or substantial changes to employment terms, the responsible manager checks the legal and contractual grounds and applicable procedure, obtaining competent advice where needed. Required hearings, consultation, warnings, alternative work assessments and notice are completed as applicable. The employee is treated respectfully, receives required information and documents, and final pay and leave entitlements are checked.

7 Practical health and safety controls

We provide employees with a safe and healthy working environment in compliance with all applicable laws and regulations. We also adhere to all safety regulations agreed upon in contractual documents. The company ensures employees always have access to drinking water,

clean restroom facilities, proper ventilation, emergency exits, adequate lighting, and first-aid equipment or other forms of immediate medical care.

Employee safety representatives are elected by employees where required.

The occupational health care provider conducts a workplace survey at intervals specified in the occupational health care action plan, normally every three to five years, and sooner if working conditions change significantly. The CEO ensures that the survey is arranged, and managers implement and follow up on the agreed measures within their areas of responsibility.

8 Discrimination and harassment

We do not accept any form 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. We commit to a workplace free of threats of violence, physical punishment, physical or verbal abuse, or any other form of unlawful harassment.

Discrimination and harassment protections apply in the office, online, during remote work, at customer premises, and at company events. Managers intervene promptly when concerns arise and arrange reasonable adjustments when needed. Reports may bypass anyone involved; concerns about the CEO may be raised with an unconflicted Board member. Retaliation for honest reporting or assisting an investigation is prohibited. An impartial case handler hears relevant parties, records findings, arranges protection and remedy, and checks for recurrence or retaliation. External reporting and representation rights remain available.

9 Supply chain responsibility

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

Resources: Supplier code of conduct

10 Continuous improvement and monitoring

We at Systam are committed to continually improving our practices. We regularly review and update this policy to reflect changes in laws, standards, and best practices.

Every employee must report any suspected or observed breach of the law, this policy, 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 own 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.

11 Management responsibility

The CEO is accountable for implementing this policy. The CEO provides resources, assigns practical tasks to managers and a designated personnel contact, and reviews implementation and corrective actions at least annually. The same person may hold several operational responsibilities; the CEO retains overall accountability.

Approved by:

Anssi Tamminen
CEO Systam Oy
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