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Anti-corruption policy

This Anti-corruption policy sets out the principles and guidelines to ensure all our employees, contractors, and representatives comply with anti-corruption laws and ethical business practices. Systam has a zero-tolerance approach towards all forms of bribery and corruption.

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1 Definitions

Corruption: The abuse of entrusted power for private gain.

Bribery: Offering, giving, receiving, or soliciting something of value to influence a decision or gain an improper advantage.

Facilitation payments: Small, unofficial payments made to expedite routine actions or services, for example, at border crossings.

2 Basic principles

We at Systam 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.

Facilitation payments are prohibited unless there is an imminent threat to personal safety.

Systam will not tolerate any level of corruption. All allegations of bribery and corruption (anonymous or otherwise) will be investigated thoroughly without regard to the suspected person's position, length of service, or relationship to Systam.

We also expect our partners to uphold the same high standards of conduct that we follow.

Resources: Supplier code of conduct

3 Gifts and hospitality and conflicts of interest

Gifts and hospitality must have a legitimate business purpose, be modest, transparent and lawful, and must never improperly influence a decision. Cash, cash equivalents, secret benefits and benefits linked to an improper procurement advantage are prohibited. Business gifts and hospitality require advance approval by an unconflicted manager. Benefits involving public officials or an active tender require specific review before proceeding. Approval cannot authorize prohibited benefits.

4 Payments partners and implementation

Before payment, the person checking the transaction verifies the business purpose, invoice, recipient, and approval. Unusual commissions, third-party accounts and changed bank details require additional checks through a trusted contact route. All transactions must be accurately recorded; false invoices and off-book funds are prohibited. Donations and sponsorships require independent approval of the purpose and recipient and must not conceal an improper benefit.

Before appointing an intermediary or supplier with elevated corruption risk, the responsible manager checks ownership, services, reputation, and payment terms, communicates this policy, and records the decision.

5 Conflicts of interest

A conflict of interest can occur when an employee's personal or business situation impacts their ability to apply judgment.

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

If a conflict arises, the manager records how it is managed, including recusal where appropriate.

6 Reporting violations

Every employee must report any suspected or observed breach of the law, this policy, or other Systam policies. We encourage employees to contact their 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.

7 Management responsibility

The CEO is accountable for implementing this policy, providing resources and maintaining effective anti-bribery and corruption controls. Managers apply the controls in sales, procurement, expenses and partner relationships. The CEO reviews risks, training, reported concerns and corrective actions at least annually. Matters involving the CEO are reviewed by an unconflicted Board member; no person may approve their own benefit or investigate their own conduct.

8 Incident handling and protection

A payment made under an imminent threat to personal safety must be reported to the CEO as soon as safely possible and recorded accurately. Other suspected violations follow the existing reporting routes, with an unconflicted Board member available for concerns about the CEO. Retaliation for honest reporting or assisting an investigation is prohibited. The case handler assesses the concern impartially, records findings, and assigns corrective actions, owners, and completion dates. Management verifies completion and considers any required external reporting. Reporting arrangements must support the confidentiality and anonymity commitments in this policy and applicable legal obligations.

Approved by:

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29.1.2025
Version 2 / Updated Oct 2026