



Digia Plc

CODE OF CONDUCT

2022

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DIGIA PLC'S CODE OF CONDUCT

1 Foreword

Dear colleagues,

Digia is a software and service company that helps its customers renew themselves in the networked world. Our goal is sustainable digitalisation that makes a difference – through collaboration with our customers and partners.

Our sustainable way of working is based on our shared cultural principles and ethical, law-abiding operations, complemented by our policy and Code of Conduct. Compliance with the Code of Conduct and our responsible way of working are integral to our strategy and instrumental to our business success. In collaboration with our customers and network, our policy guides us in our everyday work and helps us achieve our goals. The only way we can lay the foundation for the growth and success of our company is by doing the right thing.

Our goal is for our entire organisation and everyone in our value chain to internalise our shared way of working and commit themselves to implementing it, as practical action and everyday choices are the only way we can make a difference. This is also how we will build trust and make Digia an even more impactful work community, employer, supplier, partner and social actor.

Together, and with shared ground rules, we can build sustainable digitalisation!

Timo Levoranta
CEO

2 Purpose of the Code of Conduct

Strong customer relations, professionalism, product and service packages, a partnership network and a sustainable business model form the basis of Digia's operations. Our sustainable business model is based on this Code of Conduct, approved by our Board of Directors and Management Team, and the UN Sustainable Development Goals and Global Compact.

Our Code of Conduct sets out the principles that help us make ethically sustainable decisions in our everyday work. We support and respect standards for international human rights, working conditions, anti-corruption and environmental friendliness. Our operations comply with the relevant international and regional practices. We are

committed to honest and sustainable activity in all our business operations, and the topics mentioned above are among our core values.

Compliance with the Code of Conduct is essential to our business success. Accordingly, all our personnel, including the management and Board of Directors, are responsible for complying with these principles. The Code of Conduct also applies to Digia's subsidiaries, subcontractors and network.

The Code of Conduct is complemented by more detailed guidelines, policies and operating principles in various sub-areas.

Our cultural principles:

- Learning: every Digian is a Senior Trainee
- Sharing: together we know more
- Courage: it will not sting that bad
- Professional pride: we stand behind our work

Standards and policies:

- ISO 9001 Quality management system
- ISO 27001 Information security management system
- Anti-corruption and anti-bribery policy
- Environmental policy
- Disclosure policy
- Security policies, including information security and data protection policies and more detailed operating instructions
- Ethical principles for using artificial intelligence

Guidelines related to our Code of Conduct:

- Equality and non-discrimination plan
- Early intervention
- Inappropriate behaviour and harassment

This Code of Conduct demonstrates our commitment to honest and sustainable activity in all our business operations. We monitor and report on our activities in accordance with the guidelines appropriately, and we actively develop our operations. Our goal is for our entire organisation and partner network to internalise and comply with our ethical practices.

3 Sustainable business

We have the opportunity to influence the development of our society through digital solutions. By ensuring that our solutions are functional, secure and easy to use, we also promote the responsible digitalisation of society.

Digia aims to act as a technological pioneer whose products and services promote the development and wellbeing of society and the environment.

3.1 Legality of operations

At Digia, we always strive to ensure that we comply with the laws, regulations and other official guidelines in all our day-to-day business and other activities.

We train and inform our personnel, subcontractors and other partners about the relevant legal requirements and ensure we keep our knowledge of the applicable legislation up to date. We do not permit any illegal activity. We always require our subcontractors and partners to behave likewise. Our subcontractors and supplier partners are committed to compliance with the Digia Supplier Code of Conduct.

3.2 A high-quality customer experience

Digia uses an ISO 9001 certified quality management system, which is audited regularly. Digia's quality policy supports our strategy and ensures that everyone is on the same page regarding the standard of our product and service development, assignments, managed services and support functions. Our goal is to achieve deep partnerships with our customers through good customer satisfaction.

Digia operates in the market to fulfil customer needs, offering products and services that generate added customer value. Careful consideration of customer requirements enables a good customer experience and lays the foundation for financially profitable operations. Our cultural principles include professional pride, which guides how we work. It is our responsibility to offer our customers continuously better products and services, whatever our role may be.

3.3 Open communication

We aim to serve our stakeholders in the best way possible and promote effective cooperation. That is why we strive for transparency and timeliness in all our communications. We ensure that we only communicate correct and reliable information in line with our internal disclosure policy. We are a listed company, so we are also obliged to comply with laws on public communications. We publish accurate, up-to-date information on Digia's current position to avoid conveying any information that could mislead our customers, partners, investors or other members of the public.

3.4 Fair competition

At Digia, we always compete fairly and professionally. We comply with the relevant competition laws in all our interactions with our competitors, customers, suppliers and other partners. We do not participate in any arrangements that could impede fair competition. Examples of such arrangements include illegal agreements against competitors with the aim of influencing prices or promoting unfair trading practices.

4 Respecting the environment

We care about the environment and seek to make sustainable choices in our procurements. We encourage environmentally friendly solutions in our business and work environment and expect our subcontractors and partners to do likewise. We deliver on our environmental responsibility in the everyday work of our work community, operating in balance with the climate and the carrying capacity of nature. This is part of our goal of accelerating the ecological renewal of society.

We aim to be a carbon-neutral company. Our operations have been carbon neutral since 2020, and our objective is to be carbon neutral throughout our entire value chain by 2030. We also seek to cut emissions by 75 per cent from the 2019 baseline by 2030. Our climate roadmap helps us to achieve these goals.

Our work is guided by a responsibility programme, which we prepare for each strategy period. The programme sets out our corporate responsibility focus areas and the associated targets and metrics.

5 A healthy work community and human rights

Digia is an international group of companies with its roots in Finland. We aim to offer our personnel a healthy, diverse and inclusive work community. We are a strong part of the surrounding society, and we contribute our expertise to help develop society.

5.1 Human rights and equality

We comply with internationally-recognised human rights and labour rights and standards (UN Universal Declaration of Human Rights, UN Global Compact, and ILO Declaration on Fundamental Principles and Rights at Work), and we apply them to all our employees.

We treat all our stakeholders respectfully. We do not permit discrimination against any person on the grounds of ethnic origin, language, age, sex, disability, sexual

orientation, belief, political views, family status, social background or any other such characteristics.

We also do not tolerate any kind of bullying or harassment, such as violence, sexual harassment, racism, inappropriate punishment or any form of abuse. We do not allow the use of forced labour or child labour.

A culture of mutual respect is the most important focus area for us in terms of equality and non-discrimination. We encourage our employees to network and create a psychologically safe and constructive work community. We require everyone to behave appropriately and respectfully towards their colleagues. Every Digian contributes to a safe and friendly work atmosphere. We observe policies such as etiquette in internal communication channels. We train supervisors in particular, but also the entire work community, to intervene in inappropriate behaviour. If harassment, discrimination or bullying occurs, the supervisor intervenes right away. If co-workers notice any harassment or inappropriate treatment, they are also expected to raise the issue.

We regularly commission an equality and non-discrimination survey among our personnel, using it as the basis for our action plan in each strategy period. We raise awareness of the above themes among our personnel through regular communication. The equality and non-discrimination plan is a part of the orientation programme for new employees. We also train senior managers, supervisors and personnel to identify unconscious biases and to speak out if they notice or experience discrimination.

We respect our employees' right to organise, their freedom to join or not to join associations and trade unions, and their right to collective bargaining with the company. If necessary, we endeavour to promote other forms of employee representation.

We provide equal opportunities to all our employees to engage in self-development, pursue further education and training, obtain benefits and advance in their careers in accordance with their interests, performance and abilities.

5.2 Health and safety

Digia aims to look after its employees' wellbeing. We take our employees' health into consideration and support their wellbeing and various life stages in cooperation with the occupational health service and other wellbeing service providers.

Our early intervention model ensures we provide support at the earliest stage. We help our employees maintain their working capacity through regular discussions with supervisors, the effective arrangement of work duties, flexible working hours, and the opportunity for part-time and remote work. We have also received good evaluations for these in our personnel surveys. In addition, we offer employee benefits that support

wellbeing, such as dental care, comprehensive medical expenses insurance, holiday cottages and discounts on ergonomic products. Digia has a zero-tolerance policy against harassment and inappropriate behaviour and guidelines to follow if it arises.

5.3 Fair working conditions

It is important for us to offer everyone a safe and healthy working environment where everyone is valued for who they are and look after the wellbeing and psychological safety of the work community.

At Digia, we seek to ensure that all our employees understand their employment contracts and the associated terms and conditions and are aware of the details in employment contracts before the contracts take effect. We ensure that our employees are paid fairly and our remuneration is always at least as good as the requirements in the applicable laws or standards in the sector, whichever is higher.

We do not permit the use of child labour, and we always comply with laws on age limits. Digia employs a broad spectrum of professionals of different ages and at different career stages, and it is important for us to guarantee a good orientation and opportunities for networking, career progression and training for employees of all ages.

We respect our employees' right to unionise and participate in trade union action – employees do not face disciplinary action for being involved in union activities. We do not allow any kind of forced labour, and our employees are free to leave their jobs after the notice period specified in the employment contract.

5.4 Continuous learning

Skilled personnel who are committed to the objectives of our customers are the cornerstone of all our operations. We aim to be a desirable employer in the technology sector – an employer that supports personnel wellbeing and competence development. Digia offers a wide range of projects, roles and job rotation opportunities where experts hone new skills in everyday work. Our tribe activities, teamworking, self-study and training also support continuous learning.

Learning is one of our main cultural principles that guide our operations. Learning is vital in constant change. In line with our cultural principles, we are committed to actively sharing the things we learn. Learning is an investment that accrues interest every day.

Digia recognises its role as a significant employer and operator in the IT sector. That is why we have a responsibility to strengthen technological expertise, both within our organisation and in networks outside the company. Among other things, we offer recruiting training programmes for young people and career-changers, as well as thesis opportunities and internships.

6 Information security and confidentiality

Digia's security management system complies with the international ISO 27001 standard for information security management. Our ISO 27001 certificate shows that we manage information security systematically, invest in risk management, and are a reliable partner. The standard also serves as a framework for information security management, aiding in the implementation, maintenance and continuous improvement of security. Our operations are supported by various security policies, such as risk management, security and data protection policies.

Information security means ensuring the confidentiality, integrity, availability and non-repudiation of data, irrespective of its form. We ensure that the data, materials and equipment in our possession are safe, whether they belong to us, our customers or partners. We ensure appropriate information security measures to safeguard the security of all the data we have access to.

We keep inside information and other non-public information strictly confidential and instruct our employees on how to take care of the confidentiality of information. The misuse of inside information and other non-public information is strictly prohibited.

We protect the personal data of our employees, customers, subcontractors and other partners. We comply with data protection legislation and regulations when collecting, storing, processing, transferring and disseminating personal data. We process all personal data we use responsibly and carefully. We maintain appropriate data processing records and update our internal data protection measures and practices regularly. We follow our data protection policy in every phase of personal data processing so that we can demonstrate our compliance with the obligations in the General Data Protection Regulation.

7 Our working method

7.1 Financial reporting

We ensure that our transactions and financial position are described in detail in the company's financial accounting in accordance with the applicable laws and other government regulations. We require all employees to accurately report and keep a record of any expenses related to potential and current customers. All contracts, invoices and receipts related to such expenses must be submitted, approved and retained in accordance with our internal practices and instructions. Accounts that do not indicate the source or nature of the expense are strictly prohibited.

7.2 Intellectual property rights

We respect third-party rights, such as patents, licences, trademarks and other intellectual property rights, and we require the same of our subcontractor and other partners.

7.3 Procurement

We strive for sustainable operations in our procurement activities. We take into account the aspects of environmental and social responsibility when we conduct procurement. We have analysed the potential human rights and environmental risk factors of our operations and pay special attention to minimising them. We also instruct our personnel on sustainable choices in procurement.

7.4 Anti-bribery and anti-corruption policy

Digia does business in an ethically sustainable way. We do not condone bribery or corruption in any form. We refrain from all types of corruption, blackmail and bribery and ensure that any payments, gifts and other commitments to our customers, the authorities and other parties comply with the applicable laws against bribery.

We ensure that all our subcontractors and other partners are aware of our zero-tolerance policy towards all forms of corruption, and we require them to commit to corresponding practices.

We do not solicit or accept any financial or other benefits that we suspect would involve expectations or intentions to provide business benefits in return. We also do not accept anything of value from government officials or offer them any such items. We instruct our employees that they may only accept gifts or hospitality of negligible value, and they must refuse gifts or hospitality arranged in a way that could influence the outcome of a transaction. Furthermore, we train our employees to work against bribery and corruption and maintain an internal policy against bribery and corruption.

8 Commitment to common operating practices

Our Code of Conduct and sustainable way of working are the cornerstones of our business. All Digians are committed to working in line with our Code of Conduct, and they take responsibility for the ethicality of their actions. We encourage and train Digians and our partners to act in accordance with our common operating practices. The Code of Conduct is a part of the orientation programme for new Digians, and we ensure that everyone completes a training course in the Code of Conduct. We also arrange various internal briefings on operating practices. Our goal is for our culture and

this Code of Conduct to guide our day-to-day work and decision-making so that it is easy for us to work in an ethically sustainable way and prevent misconduct.

8.1 Reporting irregularities

To ensure compliance with this Code of Conduct and our ability to actively develop the way we work, we report on all incidents or suspected cases of misconduct related to issues covered by this Code of Conduct.

We encourage our employees, subcontractors and other partners to report suspected misconduct and, if necessary, supply the documentation necessary to investigate the matter. If necessary, we can conduct an audit to determine whether any misconduct has occurred. All reports and notifications are treated confidentially. We do not permit retaliatory action or any other countermeasures against a person who submits such notification in good faith.

We have introduced a Whistleblowing channel in accordance with the EU Directive to enable employees and various stakeholders to submit anonymous reports if they notice any misconduct (defined in the law) in the company's activities. The whistleblowing channel is intended for reporting misconduct in breach of this Code of Conduct. The Whistleblowing channel is on the company's website at <https://whistleblower.digia.com>.

The Code of Conduct is permanent in nature, but it is updated whenever necessary and approved by the company's Management Team and Board of Directors.