



Tietoevry's Supplier Code of Conduct

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Letter from the President and CEO

Tietoevry is committed to contribute to a sustainable future through the way we do business. This means that we as a company need to be environmentally, socially, and financially responsible in our own operations. We are committed to take responsibility to identify, mitigate and prevent any negative impact we create in our operations but also throughout our value chain. We strive to proactively work towards contributing positively to people and the planet through our solutions and services – in cooperation with customers and partners. We aim to be an ethical forerunner in all countries in which we operate. Respect for human rights and fair labour conditions is a fundamental part of our values. Tietoevry's business operations worldwide are based on internationally recognized environmental standards. Tietoevry promotes ethical business practices and fair competition.

Tietoevry and its employees have undertaken to act in accordance with Tietoevry's Code of Conduct. The purpose of this Supplier Code of Conduct is to communicate the common set of ethical and business principles that is necessary for our business partners to follow.

We expect all our suppliers and other business partners to abide by all economical, ethical, and environmental laws and regulations, as well as respect the principles of this Supplier Code. Furthermore, the Suppliers shall ensure that their subcontractors are informed and that they comply with the principles set out in this Supplier Code.

Kimmo Alkio

President and CEO



Introduction

1. Tietoevry's commitments and principles

We support the UN Global Compact, the Science based target initiative, the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Companies, and ISO 14001. Our Supplier Code of Conduct (The Code) is built upon these principles and is complemented with Tietoevry specific expectations.

The Code sets out the mandatory minimum requirements to be applied between Tietoevry and the Supplier and comprises of the following areas:

- Human rights and labour conditions
- Environment
- Business ethics and anti-corruption
- Legal compliance

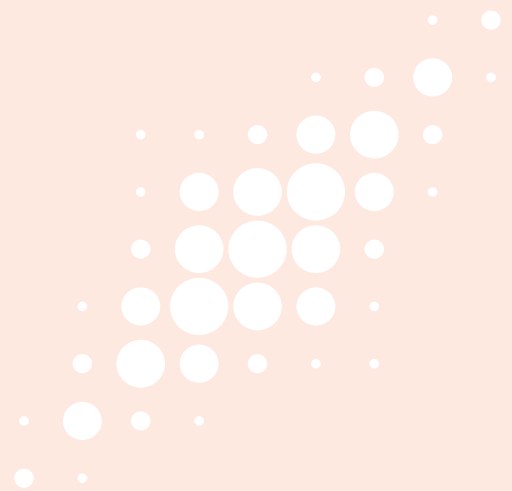
2. Scope and applicability

The Supplier shall at all times during the term of agreement(s) with Tietoevry comply with this Supplier Code in all countries they operate. It is the responsibility of the Supplier to ensure that its employees, relevant affiliated companies, and subcontractors are informed about the content and comply with the requirements.

The Supplier undertakes to comply with the UNGC principles as well as local regulations and legal practices. In cases of conflict between relevant laws and the principles described in this Code, the highest standard shall prevail to ensure sustainable operations.



Requirements





3. Human rights and labour conditions

3.1. Non-discrimination and equal opportunities

Employees must not be subject to discrimination or to physical, sexual, psychological or verbal harassment or abuse based on gender, nationality, religion, race, age, disability, sexual orientation, pregnancy, marital status, political opinion, union membership, social or ethnic origin or any other status protected by local law. The Supplier promotes the idea that all employees shall be treated with equal respect and dignity.

Furthermore, the Supplier promotes a culture of equal opportunities and diversity where appointments to jobs, rewarding and personal success depend on individual ability and performance. Fundamental human rights shall be known, understood, respected and applied equally to all employees whether temporarily or permanently hired, or contracted.

3.2. Modern slavery

Modern slavery, including forced, bonded, or compulsory labour, prison labour, child slavery, deceptive recruiting, human trafficking or any other kind of exploitation or abuse is unacceptable to TietoEvry. Suppliers, nor their recruitment agencies, shall not engage or tolerate:

- confiscation of identity documents and/or passports
- withholding of wages
- abusive working conditions
- debt bondage
- violence
- restrictions of movement
- excessive recruitment fees or cash deposits

3.3 Child labour

Child labour is unacceptable to Tietoevry. In regard to child labour, the ILO convention No. 138 on the minimum age for admission to employment and work must be respected. No one under 15 years of age, or older where local law stipulates another higher minimum age, shall be employed by Tietoevry, our business partners or in their supply chain.

Suppliers are expected through continuous risk assessments to prevent child labour in their operations and supply chain and ensure legal working conditions for young workers (i.e. those below 18 years old). If child labour is identified, a remediation must be carried out, with the best interest of the child in focus.

Young workers must not perform work that is mentally, physically, socially, or morally hazardous or that interferes with their mandatory schooling. Young workers must not work night shifts.

3.4 Freedom of association and collective bargaining

The Supplier shall support freedom of association, and all employees have the right to be, or not to be, a member of a trade union and to bargain collectively.

The Supplier shall not discriminate against workers' representatives or members of trade unions, who shall also have access to carry out their representative functions in the workplace.

3.5 Wages and benefits

Suppliers should pay all workers a wage that meets basic needs and provides a discretionary income in compliance with all relevant legal requirements, or with applicable collective agreements.

Employees with the same qualifications, experience and performance have the right to equal pay for equal work with respect to their relevant comparators. Men and women should be equally remunerated. Working hours, overtime, breaks and leaves must comply with relevant legal requirements, or with applicable collective agreements. Excessive overtime must not be a norm and overtime must be kept within local legal limits.

Employees must be informed of their employment conditions, including their rights and obligations, in their native language or a language they understand, for example, in a written labour contract.

Suppliers are encouraged to provide working conditions that provide a healthy work-life balance, including possibilities for caring responsibilities and recreation.

3.6 Health and safety

All employees shall be provided with safe and healthy working conditions and environments. Adequate steps to prevent accidents and injury to health shall be taken by minimizing the potential causes of hazards inherent in the working environment and by providing appropriate safety equipment.



4. Environment

4.1 Environmental management

The Supplier shall always apply the precautionary principle, which means that they are expected to always take precautionary measures whenever there is reason to believe that a potential action may negatively impact the health or safety of a person, society and the environment.

The Supplier shall have an environmental management system ensuring effective planning, operation and control of environmental aspects. The Supplier's environmental management system shall be equivalent to the requirements in the ISO14001 or Eco-Management and Audit Scheme (EMAS). The environmental management system shall include a continuous improvement program.

We expect suppliers to apply the principles of circular economy including whole life costing and life cycle perspective in design, manufacture, transport, recycling and disposal. Electronic waste, for example obsolete servers, computers and other ICT goods, must be handled without harming the environment and with respect to human rights.

The Supplier shall acknowledge environmental legislation and applicable regulations and be able to provide evidence of compliance.

4.2 Science-based Targets (SBT)

As part of our commitment to the Paris Climate Agreement and to establish net zero GHG emission supply chain, Tietoevry requires that its significant suppliers by emission should have science-based targets by 2026. Therefore, Tietoevry strongly encourage suppliers to set Science Based Targets for full scopes as defined by the Greenhouse Gas Protocol Corporate Standard and have these verified by Science Based Target Initiative.

Tietoevry will during 2023 include climate-related targets and performance as part of the supplier selection criteria. This means that suppliers who share our ambition and are executing on their reduction plans will have higher success in winning business from us.



5. Business ethics and anti-corruption

5.1 Anti-corruption

No abuse of power, nepotism or bribery, including improper offers of payments to or from employees or organizations, shall be tolerated. Gifts or similar benefits may only be offered to, or accepted from, a third party if modest in value and if consistent with reasonable hospitality given in the ordinary course of business.

5.2 Fair competition

Tietoevry is firmly committed to fair competition and open markets. We require free and fair competition and expect the Supplier to compete as forcefully and constructively as possible while at all times complying with international and national competition law and regulations.

5.3 Trade and sanctions compliance

The Supplier shall ensure that their business practices are in accordance with applicable regulation governing the import/export of their deliverables. We expect suppliers to comply with local laws and international sanctions or regulations as well as provide truthful and accurate information and obtain export licenses and consents, where necessary. The Supplier warrants that it or its shareholders are not subject to any economic or administrative sanctions.

5.4 Conflict of interest

Business decisions shall always be made in the best interest of the companies involved, i.e., the Supplier and Tietoevry both. Personal relations or considerations will never influence decision-making. Should there be any risk, however small, of a conflict of interest, employees of both the supplier and Tietoevry are instructed to immediately inform their manager.

5.5 Fraud, extortion, money laundering and other related crimes

The Supplier shall abide by all applicable national and international regulations aiming at preventing, detecting, and remedying economic crime and in particular fraud, extortion, money laundering and other related crimes. Supplier and Tietoevry employees will refrain from any act or omission in connection to such criminal activities and shall actively cooperate with any inquiry in relation to such crimes.

5.6 Sourcing of minerals

Tietoevry expects that the Supplier supports ethical sourcing of all minerals. Supply chains that either directly or indirectly contribute to conflicts or to serious human rights violations are unacceptable to Tietoevry. Arbitrary disengagement from conflict areas may cause negative consequences to the local population though and that is why Tietoevry encourages ethical sourcing and responsible exit procedures from suppliers that source minerals from these areas.

5.7 Responsible AI

Tietoevry expects Suppliers that develop Artificial Intelligence, Machine Learning, Autonomous and Intelligent Systems or similar technologies (collectively “AI”) for or with Tietoevry, to safeguard that the technology is reliable and developed in accordance with applicable laws and regulations and with globally recognized ethics standards that address potential adverse risks or impacts on human rights.

5.8 Security

Security and safety measures must be an integral part of all services, products, and processes. Therefore, the Supplier has a shared responsibility of behaving in a secure manner by knowing and adhering to Tietoevry’s security policies and rules.

5.9 Privacy

The Supplier shall be committed to respecting and safeguarding the privacy of everyone we interact with, including employees, customers, suppliers, business partners and others. Any processing of personal data shall be limited in scope and duration to what is deemed necessary and in accordance with applicable data protection legislation. The Supplier shall have strict policies and processes in place to protect any personal data from unauthorized access or unintended disclosure.

5.10 Insurance coverage

The Supplier is obliged to ensure that there are accurate and complete insurance schemes covering its operations, services and products.

5.11 Political involvement

The Tietoevry name, or any resources controlled by Tietoevry, shall not be used to promote the interests of political parties or candidates.



6. Compliance and sanctions

6.1 Continuous improvement and management systems

The Supplier is required to have appropriate management systems to enable adherence to this Code. The functioning and quality of the management system shall be in proportion to the size, complexity, and risk environment of the Supplier's business. This means that the Supplier shall adopt a systematic approach to the assessment, mitigation and management of risks, measurable performance targets and monitoring and follow up of them. In addition, adequate communication and training about the requirements should take place.

6.2 Breach reporting

Should the Supplier find any obstacles in meeting the requirements or find any breaches, those shall be reported immediately to the Supplier's main contact in Tietoevry. Suppliers and others may also report suspected violations of this Supplier Code or other unethical conduct confidentially and anonymously through the Tietoevry Whistleblowing channel available at <https://Tietoevry.whistleblownetwork.net>.

Actions inconsistent with the Supplier Code must be promptly corrected and may be subject to sanctions. In event of a material breach, Tietoevry is entitled to terminate the agreement with an immediate effect. Supplier shall ensure that adequate communication and training on these requirements take place.



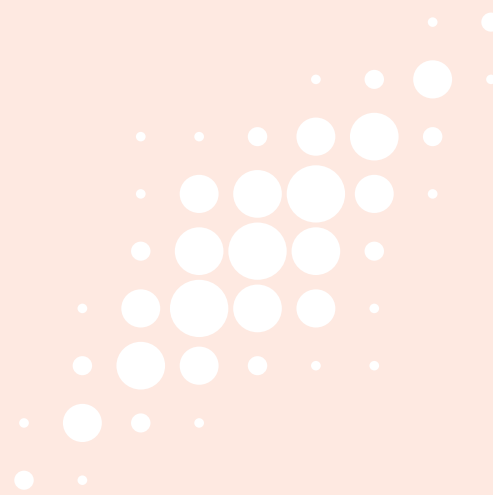
Communication and auditing

The Supplier shall provide Tietoevry with necessary information and allow Tietoevry or its representatives with access to the Supplier's relevant premises and documentation in order to verify that the Supplier, its employees, relevant affiliated companies, and subcontractors comply with this Supplier Code.

With the exception of business sensitive information, the Supplier undertakes to provide all necessary information to Tietoevry of its management systems, environmental performance, and all other relevant information to verify compliance with this Supplier Code upon request.

The Supplier and Tietoevry state that they will actively seek ways for further improvement in the areas of sustainability.

The content of this Supplier Code shall be reviewed on an ongoing basis.





Policy link

This rule is linked with the following Policy:

Code of Conduct

Deviations

Deviations to the content in this Rule need to be agreed with the Head of Sustainability. Approving deviations / changes of purely technical nature are within the authority of the Rule Owner. Sourcing shall be responsible for the sourcing process and keeping track of the deviations in a reliable manner.

Change history

| Version | Date | Changes made of | Reviewed by | Rule owner | Number of changes |
|---------|------------|-----------------|-------------------------|--------------|-------------------|
| V.15.1 | 08.07.2024 | | Ida Bohman Steenberg | Jarkko Sakki | |

TietoEVRY creates digital advantage for businesses and society. We are a leading digital services and software company with local presence and global capabilities. Our Nordic values and heritage steer our success.

Headquartered in Finland, TietoEVRY employs around 24 000 experts globally. The company serves thousands of enterprise and public sector customers in more than 90 countries. TietoEVRY's annual turnover is approximately EUR 3 billion and its shares are listed on the NASDAQ in Helsinki and Stockholm as well as on the Oslo Børs. www.tietoevry.com

