

# **Purpose and approving authority**

Our Code of Conduct describes the basic requirements and procedures for responsible business conduct at Kyrel Oy as they relate to competition, personnel policy and confidentiality. These principles aim to ensure that the company operates in line with regulations in a professional and ethical manner.

Kyrel Oy requires all staff, managers and members of the executive team to act in accordance with this Code of Conduct.

Kyrel Oy's CEO has accepted and, if necessary, will reassess these guidelines.



#### LEGAL COMPLIANCE AND ETHICS

## We comply with all laws, regulations and agreements

We comply with all applicable laws, rules and regulations in all our activities. We expect our staff to be aware of the laws and regulations that apply to their work

We are also committed to complying with international trade agreements as well as agreements with our customers, suppliers and other stakeholders.

#### We avoid conflicts of interest

Our employment contracts oblige each of our employees to act in the best interests of Kyrel Oy. A conflict of interest arises when an individual's personal interest is, or appears to be, in conflict with Kyrel Oy's interest.

We may not enter any collaboration, employment or indirect business relationship with any organization that competes or conducts business with Kyrel. We are obliged to inform the employer in advance of any such co-operation.

# We are on guard against inappropriate attempts to influence

We do not tolerate bribery or other inappropriate attempts to influence in any form.

The offer or receipt of any gift, loan, payment, reward or benefit is considered a bribe if its intention is to induce a dishonest or illegal act or cause a breach of trust in the operations of the business. Abuse of power or position in pursuit of a particular personal interest is considered corrupt.

We will also exercise discretion when it comes to standard levels of hospitality and be wary of situations where there may be an inappropriate attempt to influence, for example, future procurements.

We apply anti-corruption principles in all our business relationships and activities. We require our business partners to commit to similar practices.



## We are stewards of the company's assets

We carefully comply with the Accounting Act. We record all transactions correctly in accordance with legal obligations and good accounting practices.

We do not falsify documents or distort transactions or financial information for personal gain at the expense of Kyrel Oy.

We follow agreed reporting and approval procedures for all procurements.

## We compete freely in the market

Kyrel Oy competes in the market to meet the needs of its customers. We comply with competition legislation and do not participate in restricting competition in any way. We support appropriate, unrestricted competition in tenders and procurement at all stages of our operations.

We do not discuss customers, strategies or markets with our competitors outside of publicly available information.

We do not engage in predatory pricing to gain market share or acquire customers, and we do not take advantage of errors in, for example, customer documentation to gain short-term benefits for ourselves.

#### A SAFE AND FAIR WORKPLACE

#### We promote the further development of a fair and safe work environment

As an employer, we abide by the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

We comply with the collective agreements as our minimum conditions of employment and foster good relationships and dialogue with labor market organizations, trade unions and worker representatives.

Equal human rights apply to everyone, regardless of gender, age, skin color, race, nationality, social background, sexual orientation, political or religious beliefs, disabilities or limitations.

Our workplace community is committed to openness, honesty, fairness, justice and non-discrimination.



We do not accept bullying, harassment, discrimination or other unprofessional conduct at our workplace. We have agreed procedures in place to handle any situations involving inappropriate behavior that may arise.

We work together to promote safety in the workplace and follow the provided safety guidelines, and we actively work to correct any grievances.

#### DATA CONFIDENTIALITY AND COMMUNICATION

## Data security is a point of pride for us

In connection with its operations, Kyrel Oy maintains and processes confidential information relating to its staff, suppliers and customers.

We respect and handle this confidential data as required by law and ensure privacy in our processing of personal data.

Customers' personal data may be used only for Kyrel Oy's own marketing and will not be disclosed outside Kyrel Oy.

We maintain Kyrel Oy's data protection and data security expertise and require our staff to exercise extra care when handling information related to Kyrel Oy, its staff, suppliers or customers.

The importance of data protection and security is considered in all of Kyrel Oy's business activities and service development.

## We care about confidentiality and industrial property rights

Customer data, including customer names, customer delivery and other contracts, customer acquisition contracts and their prices, is confidential information that is essential for business purposes.

The customer's name may be mentioned only if the customer is named, for example, in a brochure as a reference, or if the confidentiality agreement has an exemption for using the customer's name in the procurement of materials, or if an exemption has been otherwise obtained in writing or verbally.

This also applies to supplier data.

Particular care should be exercised in the use of information provided to us by customers. This information is confidential, proprietary and critical to their business. This also limits internal sharing of information, i.e., information should be shared on a need-to-know basis.



When information must be disclosed, for example to suppliers, we ensure that confidentiality commitments are in place and current. At no time should this information be provided in its entirety, rather, only to the extent necessary.

# We treat our customers equally and do not take advantage of insider information

We treat all our customers equally in our production activities.

We do not use for our personal benefit, or pass on undisclosed customer information and plans, which may have an impact on, e.g., the stock market value of publicly held client companies.

# We communicate responsibly

Only authorized representatives may speak on behalf of Kyrel Oy. As employees, we keep our personal views separate from the official views of Kyrel Oy.

We do not disclose any confidential information to any party, other than those who have a legitimate need and are authorized to access it.

Information shared via instant messages, texts, blog posts and social media may be retained for a long period of time and may negatively or adversely affect you as an individual, Kyrel Oy and our stakeholders.

# **Concern Reporting Channel**

If you observe any activity in violation of this policy, or any other questionable activity, you can report it at <a href="https://whistleblowing.kyrel.fi">https://whistleblowing.kyrel.fi</a>.

The report will be put forward anonymously for independent processing.

The sender can follow the progress of the issue and receive feedback through the reporting system.