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TietoEVRY Code of Conduct

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From the CEO

At TietoEVRY, we are passionate about creating digital advantage for businesses and society. We operate in a highly dynamic data rich market, where our innovation capabilities and solution portfolio provide us a strong position at the forefront of digitalization and in improving our customers’ competitiveness.

We believe that our long-term success will be built on our values; openness, trust and diversity. Sustainability is integrated as a natural part in our daily operations and our commitment to responsible and ethical business stems from our Nordic heritage and is an essential part of our corporate culture.

At TietoEVRY, we have zero tolerance for any unethical behaviour.

Our Code of Conduct sets clear expectations for our business conduct and provides the ethical standards that will help us make the right choices every day. This Code of Conduct applies to every one of us throughout the organization, subsidiaries, hired consultants and others acting on behalf of the company. All employees and representatives are expected to be familiar with and comply with the Code of Conduct. Together, we are responsible for ensuring that the content and spirit of this Code of Conduct is understood and fulfilled.

Thank you for your support and commitment.

Kimmo Alkio
President and CEO
1 Our values in action

1.1 Purpose - this Code of Conduct is our compass

This Code of Conduct Policy (the Code) clarifies and outlines what is expected from us as individuals and as a company. It outlines and demonstrates our commitment to ethical conduct and international standards. We can think of it as a compass that helps keep us on course with our values. Use this document as a tool to guide our decision making.

If you are uncertain of how to act in a given situation, or have questions on how to interpret the Code, please contact your manager, your local HR partner or Compliance Officer.

1.2 Scope and applicability - Where does this apply?

Our Code outlines ethical behaviour standards for all TietoEVRY employees and representatives in all countries where we operate. TietoEVRY’s subsidiaries and joint ventures are all included in the Code’s scope. The Code does not describe every possible situation that we might encounter in our work at TietoEVRY. Everyone is responsible for compliance with the Code as part of the firm ethical foundation that helps TietoEVRY do the right thing.

TietoEVRY managers must ensure that both the content and the spirit of this document are communicated, understood and applied in daily work within our organizations. Managers are expected to encourage team members to report behaviour that may be non-compliant with this Code. Suppliers and business partners are expected to comply with our Supplier Code of Conduct Rule.

TietoEVRY abides by the local laws and regulations of each country and jurisdiction in which we operate. In situations where the law does not give guidance, TietoEVRY applies these ethical standards. In cases of conflict between relevant laws and the principles described in this Code, the highest standard shall prevail to ensure sustainable operations. In addition to this Code of Conduct, more detailed policies and guidelines for some of the issues here will also apply.

1.3 Violations

At TietoEVRY we have zero tolerance for violations of the Code, and we take failures to comply with the Code and its related rules seriously. Disciplinary actions, including dismissal and legal action, may be taken if the Code is violated.

1.4 Speak up!

All of us have the responsibility to bring up matters that may be in violation of the Code, our rules or the law. Failure to do so is itself a breach of the Code. We do not need to have evidence, or be certain that it is a violation, in order to report a concern. We have resources and systems in place to look into the issues raised. TietoEVRY is committed to a culture in which everyone feels safe reporting concerns. Reporting ensures that irregularities are addressed and enables us to always act legally and ethically. TietoEVRY prohibits retaliations against anyone who reports concerns and violations in good faith. Simply put, when in doubt, we should speak up!
There are several channels through which to seek guidance or report a concern:

**Manager or local HR partner**
It is the duty of managers to help employees understand and apply the Code, supporting rules and the law. Many concerns can be resolved by them. However, those employees not comfortable with talking to their manager(s) may contact their local HR partner, or Compliance Officer directly.

**Compliance in TietoEVRY**
Violations may be made confidentially to the Compliance function in TietoEVRY, who will ensure anonymity and confidentiality.

[Compliance@tietoevry.com](mailto:Compliance@tietoevry.com) is a mailbox where you can report violations, ask questions or raise concerns. Communication to this inbox is confidential for all others than the compliance team and kept with legal privilege.

**TietoEVRY Whistleblower Channel**
Reports of violations may also be made through our external whistle-blower channel facilitated by BDO [https://tietoevry.whistleblownetwork.net](https://tietoevry.whistleblownetwork.net). All reports can be made in full anonymity and confidential/legal privilege.

All security and privacy breaches should be reported through established reporting procedures.
2  Do business ethically -
the TietoEVRY way

In the global business context, the importance of business ethics is growing continuously. TietoEVRY is committed to acting with absolute integrity and to preventing corruption in any form, with zero tolerance for any unethical behaviour. We expect all our employees and representatives to act in the best interest of TietoEVRY and not based on personal considerations or relationships.

2.1 Anti-Corruption and improper payments
TietoEVRY opposes all forms of improper payments – that is, giving or receiving something of value to influence a decision or a transaction. Employees and representatives are strictly prohibited from offering or receiving valuable gifts, travels, kickbacks, illegal payments and any offer of items of value that may inappropriately influence or reward a customer, supplier or business partner to order, purchase or use our products and services. This applies irrespective of whether such gifts are provided directly, indirectly through a third party, such as an agent, supplier, business partner or consultant, or in the form of a sponsorship or a charitable contribution. Facilitation payments – small payments or gifts made to government officials for the performance of a routing government action – are regarded as bribes and strictly prohibited.

2.2 Extortion
Extortion is the wrongful use of actual or threatened force, violence or intimidation to gain money or property from an individual or an organization. It usually involves a threat being made to the victim's person or property. Digital extortion is the act of coercing an individual or organization to pay in exchange for gaining back stolen cyber assets, such as document files, database files, or access to servers. Extortion in all forms is strictly forbidden at TietoEVRY.

2.3 Gifts, hospitality and similar benefits
TietoEVRY has a firm attitude towards gifts, remunerations and activities that may be perceived to include elements of a gift. We do not offer or accept gifts or other business courtesies like hospitality, expenses or other benefits where they might influence or appear to influence business decisions, our independence, integrity or our ability to make objective decisions in the best interest of the company.

Gifts, hospitality and business courtesies can only be accepted or offered if they are minimal in value and frequency and if the time and place are appropriate and proportionate in the context of our business activities. Under no circumstances should we accept gifts or other remuneration if it can be reasonably perceived that these are for the purpose of influencing business decisions.

It is each individual’s responsibility to be aware of other parties’ rules and policies regarding the receipt of gifts, as they may differ from TietoEVRY’s.

When TietoEVRY or our employees are hosting or attending an event, gifts and similar benefits of personal nature and hospitality may be offered or accepted only if minimal in value and if consistent with reasonable hospitality given in the ordinary course of business. When TietoEVRY has a business interest to participate in an event, TietoEVRY carries the cost.

TietoEVRY does not make any charitable donations to, or on behalf of, its customers.
2.4 Conflicts of interest
As employees and representatives should avoid any situation where a personal interest conflicts or appears
to conflict with the interest of the TietoEVRY.

An example of a situation in which a conflict of interest might occur is when an employee or representative
of TietoEVRY participates in an activity or influences a company decision that may result in personal
gain, gain for a family member or someone the employee has a close relationship with. Employees and
representatives cannot take part in, or attempt to influence a process, a decision or settlement if there is
a conflict of interest or other circumstances exist, which could give grounds to question the individual's or
TietoEVRY’s impartiality.

Should a risk for a conflict of interest arise, or if we are unsure whether such situation exists, we should
notify our manager immediately.

2.5 Duties, positions and ownership in external businesses and organizations
As employees or representatives of TietoEVRY, we cannot hold another position or carry out work for others
without prior permission. This includes start-ups and sole proprietorships. Engagements in external duties
and positions must not affect our working relationship with TietoEVRY or otherwise come into a conflict
with TietoEVRY’s business interests. Any board membership or other duties or interests in any business
or organization outside of the TietoEVRY group requires the prior written consent of our manager. All
approvals must be registered with HR. Upon request, employees should provide information to TietoEVRY
if and how they pursue a sideline occupation. TietoEVRY may require us to completely or partly cease a
sideline occupation that, in the view of TietoEVRY, acts as an obstacle to our work.

2.6 Fraud
TietoEVRY is committed to prevent and detect all forms for fraud. Fraud is a type of theft by intentional
decception that could result in unlawful gain, profit, advantage, harm or loss to TietoEVRY or another party.
Any act that intentionally conceals or misstates facts to mislead others, including customers, suppliers, third
parties or colleagues, is considered fraudulent.

2.7 Money laundering
TietoEVRY is opposed to all forms of money laundering and shall take steps to prevent that financial
transactions with the company or subsidiaries can be used to launder money.
2.8 Confidentiality
As an employee or person associated with TietoEVRY, we have a duty of confidentiality by law and/or written agreement in accordance with this Code of Conduct. We must keep confidential any information that comes to our knowledge related to TietoEVRY or any affiliated entity, their customers or business partners, and which is related to their economy, operations, products or product development, or other information relating which is not commonly known. Further, we must exercise caution when discussing internal matters to avoid being overheard by persons not concerned. The duty of confidentiality does not only apply externally, but also towards other employees in TietoEVRY who do not need the information in the performance of their duties. The duty of confidentiality applies even after the termination of employment or contractual relationship with TietoEVRY for as long as the information is considered to be confidential.

2.9 Insider information and trading
As a publicly listed company, TietoEVRY is subject to strict rules regarding the handling of inside information. Inside information is any information that is not known in the market that could have a significant effect on the price of securities or influence a decision to buy, sell or hold the security.

To avoid ethical and legal complications, we must keep all non-public information that relates to TietoEVRY’s present and future business operations strictly confidential. The misuse or disclosure of any confidential information about TietoEVRY, our customers, suppliers or business partners or another third party is prohibited.

2.10 Safeguarding corporate assets
Employees are expected to use TietoEVRY’s tangible and intangible assets only for legitimate business purposes and protect them from loss, damage or unauthorized use.

At all times we must observe security requirements concerning access to and use of TietoEVRY’s facilities, IT resources and access to electronic resources and documents. All employees are expected to comply with applicable security policies.

Intellectual property, including but not limited to documentation, source code, scripts, integrations, know-how, methodology, concepts and ideas shall be protected and managed in the interest of TietoEVRY and in accordance with relevant regulations and guidelines. Unless otherwise stated by law or orders from public authorities, we must not disclose any trade secrets or business confidential information available to unauthorized persons without prior manager approval. We should also respect the intellectual property rights and trade secrets of others and avoid infringement of such rights.
2.11 Security
As a trusted service provider of business-critical services to our customers and society as a whole, security and safety measures must be an integral part of all our services, products and processes. Each and every employee, partner and subcontractor have a shared responsibility of behaving in a secure manner by knowing and adhering to our security policies and rules.

2.12 Privacy
TietoEVRY is 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. TietoEVRY has strict policies and processes in place to protect any personal data from unauthorized access or unintended disclosure.

2.13 Trade compliance
TietoEVRY does business in many countries. As employees involved in cross-border transactions, on behalf of TietoEVRY or a customer, we must comply with applicable trade regulations, including export controls, trade restrictions, trade embargoes, economic sanctions and boycotts.

2.14 Expertise and authority
All decisions related to the Code must be made at the appropriate level in accordance with the applicable regulations and TietoEVRY’s decision making principles. We may only make internal decisions and/or commit TietoEVRY towards external third parties if an authorization for this is delegated to us, and at all times within the limits of our mandate.

2.15 Internal control
Internal controls shall ensure that TietoEVRY business processes are efficient and within an acceptable level of risk, that physical and intangible assets are safeguarded and utilized, ensure financial information is correct and timely, and comply with applicable laws, regulations and guidelines. The management is responsible for internal controls, but every individual has shared responsibility for upholding this.
3 Respect for others is fundamental

We always treat our colleagues and business partners with dignity and respect. We honour the diversity of people and recognize its inherent value. We are committed to providing fair, safe and healthy working conditions where everyone’s rights are protected.

TietoEVRY supports and respects all internationally recognized human rights including the International Bill of Human Rights and the principles concerning the fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Fundamental human rights shall be known, understood, respected and applied equally to all employees whether temporarily or permanently hired or contracted.

If we become aware of any violations with the standards set out below, we should notify our manager, HR or any other appropriate executive immediately so the appropriate actions can be swiftly taken.

3.1 Non-discrimination and equal opportunities

TietoEVRY hires and treats its employees on equal terms and does not allow any discrimination with regard to sex, gender identity, nationality, religion, belief system, race, age, disability, sexual orientation, political opinion, union membership or social or ethnic origin. We are proud to promote a culture of equal opportunities and diversity in which appointments to jobs, wages, benefits, leadership and personal development as well as access to training depend on each individual’s ability and performance. Furthermore, we promote an inclusive workplace where differences are welcome and respected, where different ideas and perspectives are expressed and listened to, where each employee finds a sense of belonging and has an equal opportunity to grow. All managers in TietoEVRY work actively to ensure diverse teams, which includes a balanced gender composition that reflects the markets TietoEVRY operates in.

3.2 Forced labour

Any employment relationship with TietoEVRY shall be freely chosen and free from threats. TietoEVRY opposes all forms of compulsory, bonded or forced labour, including trafficking. No employee shall ever be required to deposit identity papers during their employment. Employees are always free to leave their employment after the due notice period.

3.3 Child labour

TietoEVRY upholds international and local child labour standards across all our businesses. No one under 15 years of age or below the country’s legal minimum age are employed by TietoEVRY. Persons under the age of 18 shall not perform any hazardous work, including but not limited to exposure to physical or psychological stress.

3.4 Freedom of association and the right to collective bargaining

TietoEVRY supports the freedom of association. All employees have the right to be a member of a trade union and to bargain collectively. Accordingly, no disciplinary action will be taken against employees that choose to organize or join an association. As employees of TietoEVRY, we must not interfere or in any way or obstruct other employees' freedom of association, or the right to be unorganized. TietoEVRY employee representatives must be allowed to carry out their functions unhindered in the workplace.
3.5 Fair employment conditions
Employment contracts and conditions at TietoEVRY should be understandable for all employees, with equal pay for equal work regardless of gender or any other non-objective criteria. Payments and terms shall comply with applicable laws and/or industry standards, whichever is higher. Working hours must comply with applicable laws. TietoEVRY respects employees’ right to leisure time, including their right to family life and children’s rights to their parents.

3.6 Health and safety
Our employees’ well-being is essential to TietoEVRY. We endeavour to be a pioneer in the field of health, safety and employee security to promote good health and safe working environment in compliance with internationally recognized standards. We all share the responsibility for achieving this goal. We should do our utmost to control hazards and take necessary precautions to prevent accidents and occupational diseases. We must keep the working environment free from bullying, harassment or similar. We do not tolerate any behaviour that can be perceived as degrading or threatening.

Employees, when possible, are offered flexible working conditions – with respect to time and place – in order to support a healthy work-life balance.
4 Act responsibly in the marketplace

TietoEVRY seeks to earn and maintain the respect and trust of our stakeholders. As TietoEVRY employees and representatives, we should treat everyone they encounter in the marketplace with the same ethical standards as when engaging with colleagues.

4.1 Political activity
TietoEVRY does not provide financial or any other kind of support or assistance to individual politicians, candidates, political parties or institutions. Neither the TietoEVRY name nor any resources controlled by TietoEVRY can be used to promote the interests of political parties or candidates. Employees participating in political activities will be granted leave from their work in accordance with the law and agreements.

4.2 Fair competition
Antitrust and competition laws are in place to promote fair competition and protect customers from inequitable business practices. TietoEVRY embraces and supports fair competition. This means that under no circumstances should we cause or contribute to any breach of competition regulations, including but not limited to illegal agreements between competitors that aim to restrict or prevent free competition, fix prices or otherwise promote illegal trade practices. TietoEVRY never disparages the products or services of our competitors.

4.3 Responsible communication
TietoEVRY is a publicly traded company and must comply with regulations that govern public communications to investors and the general public. All information from TietoEVRY should be reliable and correct and maintain high professional and ethical standards. Communication with the media, the public or financial markets must take place in accordance with defined guidelines and procedures and comply with rules and practice applicable to public listed companies. We must reflect these principles in all activities in our communication channels, including social media. If we are contacted by a journalist, outside consultant, analyst or similar and are unsure whether we can or should give a statement, we may consult with TietoEVRY’s Newsdesk for guidance.

4.4 Relations with customers, suppliers and public authorities
We must meet customers with insight, respect and understanding. We must always try to fulfil the needs of the customer in the best possible manner, within the business ethical guidelines that apply to the business. Equally, we must treat suppliers impartially and justly. Suppliers in competition for contracts with TietoEVRY should be able to trust TietoEVRY’s selection processes. Public authorities shall be met in an appropriate and open manner. Any public information about the company should be given by TietoEVRY’s management or by the person responsible for public communications, unless otherwise agreed.

4.5 Accounting and reporting
All accounting and reporting by TietoEVRY is conducted in accordance with generally accepted financial accounting practices. Our accounting practices ensures that business transactions are fully, correctly and timely reported and documented. All financial disclosures are transparent, relevant, timely and understandable.
4.6 Responsible procurement

TietoEVRY expects its suppliers and service providers to comply with all applicable laws and regulations. Suppliers that have a direct contractual relationship with TietoEVRY must adhere to the principles outlined in the Supplier Code of Conduct, which are minimum standards in key areas such as business ethics, anti-corruption, human rights and labour conditions.

When making purchases as an employee of TietoEVRY, we should always use TietoEVRY’s procurement channels and involve a procurement contact in the process.

4.7 Environment

TietoEVRY promotes development and diffusion of low carbon technologies and undertake initiatives to promote sustainable IT services. TietoEVRY adheres to all relevant local and internationally recognized standards, and continuously works to improve environmental performance. Our precautionary approach to environmentally responsible ways of conducting business should extend throughout the value chain.
5 Policy basics

5.1 Policy basics

<table>
<thead>
<tr>
<th>Owner</th>
<th>Kia Haring, Head of Sustainability</th>
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<td>Ulrika Lagerqvist von Unge</td>
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<td>20.03.2021</td>
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<tr>
<td>Approver</td>
<td>CEO</td>
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<tr>
<td>Effective date</td>
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<td>Reviewed</td>
<td>Yearly</td>
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<td>References</td>
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5.2 Version history

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<td>V1.0</td>
<td>2020-02-20</td>
<td>Kia Haring</td>
<td>Ulrika Lagerqvist von Unge</td>
<td>Kimmo Alkio, CEO</td>
<td>Harmonization of Tieto and EVRY Code of Conducts</td>
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</table>
I confirm that I have read, understood and agree to comply with TietoEVRY’s Code of Conduct.

I am aware that the Code of Conduct is revised at irregular intervals and I undertake to keep myself updated on possible changes.

Name

Employee number

Date

Signature
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