

Tieto

Code of Conduct policy



tieto



You are the key to putting this code into daily practice — from our CEO

At Tieto, we are passionate about the opportunities available in the data-driven world, and we are committed to turning these opportunities into lifelong value for people, businesses and society. Through our 15,000 professionals in nearly 20 countries, we help our customers renew their business and foster new opportunities based on the latest technologies and co-innovation. Our mission is to empower everyday life and sustainable societies through technology.

We aim to be an ethical forerunner in the societies in which we operate. Our Open Source Culture is built on trust, empowerment, openness and transparency. These principles create the framework for responsible ways of conducting business and provide the basis for our interactions with our stakeholders every day. Equal opportunities, diversity and inclusiveness are the values we uphold in our operations. At Tieto, we have zero tolerance towards any unethical behavior.

This renewed 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 applies to every single one of us throughout the organization. Together, we are responsible for ensuring that the content and spirit of this document is understood and fulfilled.

Maintaining the highest standards of ethical conduct is vital to Tieto's sustainable success — let's all ensure we live this Code every day!

Kimmo Alkio
President and CEO
Tieto Corporation





At Tieto, we create value

At Tieto, we create value for our stakeholders and play an active role in the sustainable development of societies, businesses and people. We know that our long-term success requires a business model that integrates sustainability and ethical business as natural parts of our daily operations.

This means that we not only need to deliver outstanding products and services, but also conduct our business with integrity and with respect for our stakeholders. Our reputation and the trust placed in us rests on our shared commitment to responsible and ethical business, which is also integral to our corporate culture — our Open Source Culture. We are proud that you are part of this journey every day.



Live the Code — our values in action

Purpose — This Code of Conduct is our compass

This Code of Conduct Policy (the Code) clarifies and outlines what is expected from us as a company and what kind of conduct we expect our employees to demonstrate. It also explains how we comply with international legislation and norms but also our own internal rules. It outlines and demonstrates our commitment to ethical conduct, and so it serves as our compass and helps keep us on course with our values.

Scope and applicability — Where does this apply?

Our Code outlines ethical behaviour standards for all Tieto employees in all countries where we operate. Tieto's subsidiaries, joint ventures and their employees are all included in the Code's scope. This means that all employees should learn and utilize the Code and its supporting rules. Conduct in accordance with the Code is part of the firm ethical foundation that helps Tieto and its people do the right thing.

Similarly, Tieto 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 also expected to encourage team members to let you know about behaviour that may be non-compliant with this Code. Tieto strives to promote this Code with all parties contributing to Tieto's services, products and other business activities. Our expectations for the conduct of our suppliers and business partners are expressed more clearly in the Supplier Code of Conduct Rule.

Tieto always 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, Tieto applies its own ethical standards based on its values and culture. In cases of conflict between relevant laws and the principles described in this Code, the highest standard shall prevail to ensure sustainable operations.

At Tieto 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, so please use this document as a tool to guide your decision making.



Speak up!

Our Code sets high standards for us all to follow in order to maintain a good reputation and conduct business effectively, with integrity and professionalism. However, this Code cannot describe every possible situation that you might encounter in your work at Tieto. Therefore, it is the responsibility of each employee to ensure compliance. If you are uncertain of how to act in a given situation or if you have questions on how to interpret the Code, seek guidance — it is up to you!

You also have the ability and responsibility to bring up matters that might be in violation of the Code, our rules or the law. Remember that you do not need to be certain about a concern, have concrete evidence or be sure that your concern is a violation of the Code to report an issue. Rather, employees should take comfort in knowing that reports can be submitted anonymously and are always handled with the utmost confidentiality.

Tieto is committed to a culture in which employees feel safe with reporting concerns in relation to the Code. Persons reporting violations in good faith or cooperating with an investigation will not be subject to retaliation. Simply put, when in doubt, speak up! You have nothing to fear.

You have several channels through which to seek guidance or report a concern:

Your 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 satisfactorily addressed by them. However, if you are not comfortable with talking to your manager(s), you can always contact your local HR partner or the General Counsel directly.

General Counsel

Reports of violations of this Code may be made anonymously and confidentially to the General Counsel of Tieto.

The General Counsel can be reached via

email: jussi.tokola@tieto.com

phone: +358 20 725 25 72

mobile: +358 40 834 93 76

You can also report violations via regular mail to Tieto Corporation at

Jussi Tokola

Keilalahdentie 2-4, 02150 Espoo, Finland.



Do business ethically — the Tieto way

In the global business context, the importance of business ethics is growing continuously. And we at Tieto are committed to acting with absolute integrity. Tieto aims to prevent corruption in any form and has zero tolerance for any unethical behaviour. We also expect all our employees to act in the best interest of Tieto and not based on personal considerations or relationships.

Improper payments

Bribery can be described as giving or receiving something of value to influence a decision or a transaction. Bribery in any form is not accepted at Tieto as it is a clear ethical failure. This means that employees are strictly prohibited from offering or receiving bribes, 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 routine government action — are regarded as bribes and avoided with the same vigour.

Gifts and similar benefits

Gifts and similar benefits of personal nature can sometimes be part of business etiquette. But remember that gifts and similar personal benefits may only be offered to, or accepted from, a third party if modest in value and consistent with reasonable hospitality given in the ordinary course of business. And such gifts should always be valued at less than EUR 100*. It is each employee's responsibility to be aware of other parties' rules and policies regarding the receipt of gifts, as they may differ from Tieto's.

Tieto neither makes charitable donations to nor on behalf of its customers.

Hospitality related to events

Hospitality-related events — all kinds of business-related occasions with customers, suppliers and other partners — help build positive relations. But, all forms of hospitality and related events must always be legitimate, appropriate and proportionate in the context of regulation and our business activities. When Tieto or its employees are hosting or attending an event, gifts and similar benefits of personal nature and hospitality may be offered or accepted only if modest in value and if consistent with reasonable hospitality given in the ordinary course of business and not exceeding EUR 200* in value. When Tieto has a business interest to participate in an event, Tieto carries the cost.

Conflicts of interest

It is important that all employees, as well as Board members, avoid any situation where a personal interest conflicts or appears to conflict with the interest of Tieto. One example of a situation in which a conflict of interest might occur is when an employee of Tieto participates in an activity or influences a company decision that may result in personal gain, gain for a family member or someone with which the employee has a close relationship.

**Please note that the recipient of a gift, participant in a hospitality-related event or local tax authorities may apply lower monetary thresholds, which ought to be considered as well.*

Fraud

Tieto is committed to preventing and detecting fraud. Fraud is a type of theft by intentional deception that could result in unlawful gain, profit, advantage, harm or loss to Tieto or any other party. In short, any act that intentionally conceals or misstates facts to mislead others, including customers, suppliers, third parties or colleagues, is considered fraudulent.

Confidentiality and insider issues

Inside information is any precise non-public information regarding the plans or conditions of a company or its securities 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, employees must keep all non-public information that relates to Tieto's present and future business operations strictly confidential. The misuse or disclosure of any confidential information about Tieto, our customers, suppliers or business partners or another third party is prohibited. Tieto expects its employees to act with the discretion required of insiders, even if they would not officially be registered as insiders.

Safeguarding corporate assets

Safeguarding Tieto assets — both tangible and intangible (such as intellectual property rights) — is vital to Tieto's business interests. Employees are expected to use Tieto assets only for legitimate business purposes and protect them from loss, damage or unauthorized use.

Security

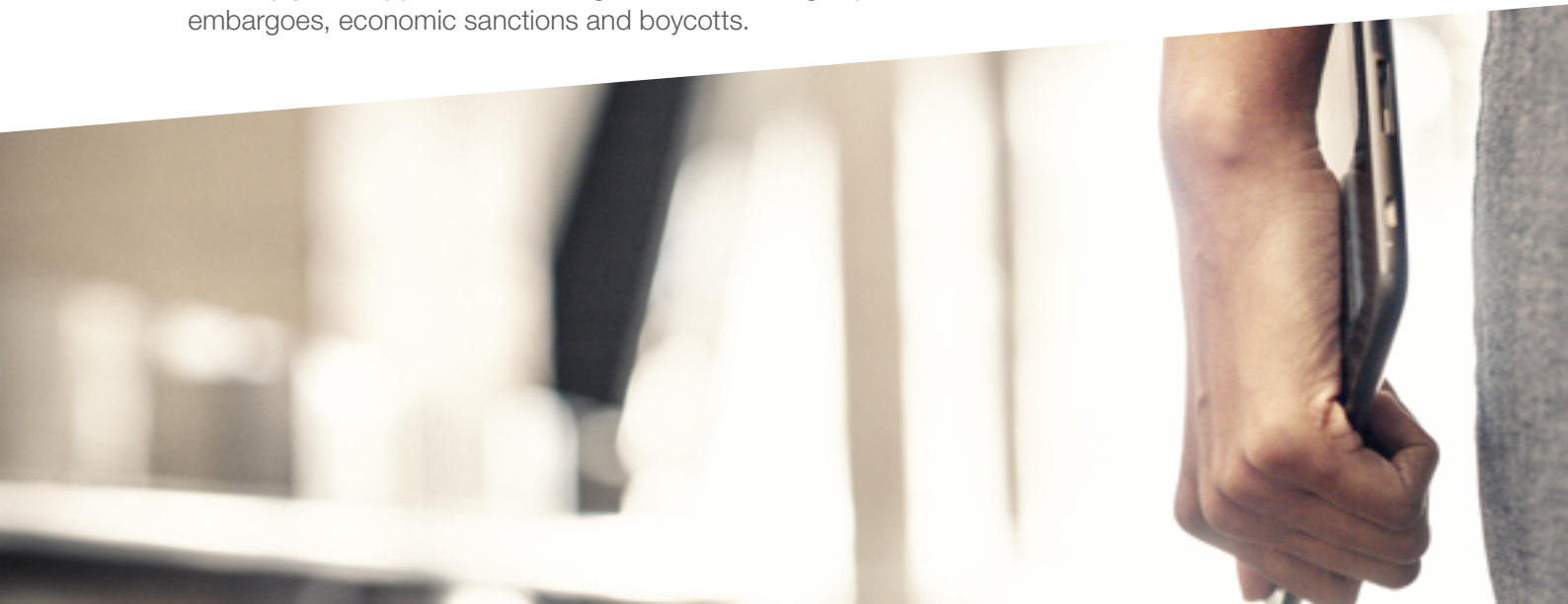
Tieto's security objective is to be a trusted service provider with adequate built-in security and safety measures across all of our services, products and processes. Security is high on our agenda, so we expect secure behaviour from all employees and partners.

Privacy

Privacy is a human right, and Tieto is thus committed to respecting and safeguarding the privacy of everyone that we do business with, including customers, suppliers, business partners and our employees. This means that we collect, use, hold and process data carefully and responsibly. We always follow all applicable laws and regulations governing privacy and data protection throughout our operations.

Trade compliance

Tieto is, as a global company, involved in the transfer of products, services and technology across international borders, and deliveries may therefore be subject to authority licenses. All employees that are involved in cross-border transactions, on behalf of Tieto or a customer, are expected to comply with applicable trade regulations, including export controls, trade restrictions, trade embargoes, economic sanctions and boycotts.





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.

Our Open Source Culture thrives on openness and transparency. Diversity and inclusion are an integral part of our dynamic culture, which aims to support Tieto's competitiveness as well as create positive and inspirational workplaces.

Tieto 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.

Non-discrimination and equal opportunities

Tieto 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 treat all people with the greatest respect and dignity. Furthermore, 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.

Forced labour

Tieto always avoids 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.

Child labour

Tieto upholds child labour standards across all our businesses. No one under 15 years of age or below the country's legal minimum age is employed by Tieto.

Freedom of association

Tieto supports the freedom of association, and all employees have the right to be a member of a trade union and to bargain collectively. Accordingly, no disciplinary action is taken against employees that choose to organize or join an association. Employees of Tieto should not interfere or in any way obstruct other employees' freedom of association or the right to be unorganized.

Physical abuse

At Tieto, employees are free from corporal punishment, physical, sexual, psychological or verbal harassment, bullying or abuse.

Fair employment conditions

Employment contracts and conditions at Tieto are always intended to be understandable for all employees, and all employees should be paid fairly. Payments and terms should always comply, at a minimum, with applicable laws or industry standards, whichever is higher. Working hours should comply with applicable legislation on working time. Tieto aims to respect employees' right to leisure time, including their right to family life and children's rights to their parents.

Health and safety

Our employee's well-being is essential to us. Tieto therefore provides all employees safe and healthy working conditions and environments. Employees, when possible, are offered flexible working conditions — with respect to time and place — in order to support a healthy work-life balance.





Act responsible in the marketplace

Tieto seeks to maintain and earn the respect and trust of our stakeholders. For that reason, all Tieto employees should treat those they encounter in the marketplace with the same ethical standards applied when engaging with colleagues. This includes our full value chain — from those involved in early plans and innovations to our customers and end-users.

Sustainability of IT services

Digitalization is a powerful means of solving environmental and societal challenges. For example, Tieto aims to help customers' transition to a low carbon economy, improve transparency and efficiency in the public sector, improve health and wellbeing and facilitate equal access to information for all citizens.

Political involvement

Tieto does not take political stances, and the company therefore does not give financial or any other kind of support or assistance to individual politicians, candidates, political parties or institutions. Neither the Tieto name nor any resources controlled by Tieto can be used to promote the interests of political parties or candidates.

Fair competition

Antitrust and competition laws are in place to promote fair competition and thus protect customers from inequitable business practices. Tieto embraces and supports fair competition. This means that we, for example, always avoid illegal agreements between competitors that aim to restrict or prevent free competition, fix prices or otherwise promote unfair trade practices.

Responsible communication

Tieto, as a publicly traded company, must comply with regulations that govern public communications to investors and the general public. To foster trust among our key stakeholders, it is crucial that we always strive for transparency and openness in our communications and enhance our continuous dialogue with key stakeholders. All employees should ensure that disclosures and information communicated only contain true and reliable information. Our communications are also in line with internal guidelines and rules as well as societal norms. This means that the spirit of the Code should be reflected in all activities in our communication channels, including social media. Tieto never disparages the products or services of our competitors.

Accurate records and reports

All accounting and reporting by Tieto is conducted in accordance with generally accepted financial accounting practices, and our accounting records always give a true and fair perspective of financial positions. Tieto strives to provide disclosures that are open, fair, relevant, timely and understandable.

Responsible procurement

Tieto expects its suppliers and service providers to adhere to the values and principles presented in this Code. Accordingly, our requirements of suppliers are described and explained in our Supplier Code of Conduct Rule. When making purchases as an employee of Tieto, always use Tieto's procurement channels and involve a procurement contact in the process.

Environment

Tieto recognizes the significant opportunity digitalization provides in reducing environmental burden. Our precautionary approach to environmentally responsible ways of conducting business spans throughout the value chain. Tieto's Environmental Rule shall be followed and respected by all employees.



Rules

Rule name	Rule id
Anti-corruption Rule	MGT00013
Supplier Code of Conduct Rule	MGT00032
Environmental Rule	EMS00001
Competition Law Compliance Rule	MGT00010
Insider Rule	LGL00011



Policy Basics

Target group(s)	All Tieto employees
Communication channels	Managers, eLearning, intranet
Stakeholders	Legal, Human Resources, Internal Audit
Related processes	Offering development, Sales and customer relationship management, Project delivery, Continuous service delivery, Support processes
Owner	Head of Sustainability
Reviewed	Yearly
Approver	CEO
References	United Nations Global Compact, OECD Guidelines for Multinational Enterprises, ILO Declaration on Fundamental Principles and Rights at Work, the International Bill of Human Rights, UN Rio Declaration on Environment and Development, the UN Convention against Corruption, UK Bribery Act, US Foreign Corrupt Practices.

Tieto aims to capture the significant opportunities of the data-driven world and turn them into lifelong value for people, business and society. We aim to be customers' first choice for business renewal by combining our software and services capabilities with a strong drive for co-innovation and ecosystems.

www.tieto.com

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