



Tietoevry Code of Conduct

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Tietoevry Code of Conduct

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From the CEO

Over the past few years, we have seen unprecedented combination of world events – the turmoil caused by the pandemic and the geopolitical tensions – bringing new considerations on how businesses are run in an ethical manner and with respect to humanity.

At Tietoevry, our vision is of a world where enterprises contribute to the common good. Our understanding of technology and its impact on humanity drives us in developing digital futures where businesses, societies and people thrive. Building on our core values of openness, trust and diversity, we carry out our everyday engagements and innovate with integrity together with our customers and business partners.

We strive for the highest degree of ethical conduct in all our actions and are committed to running our business in line with internationally recognized ethical and responsible business practices, such as United Nations Guiding Principles on Business and Human Rights.

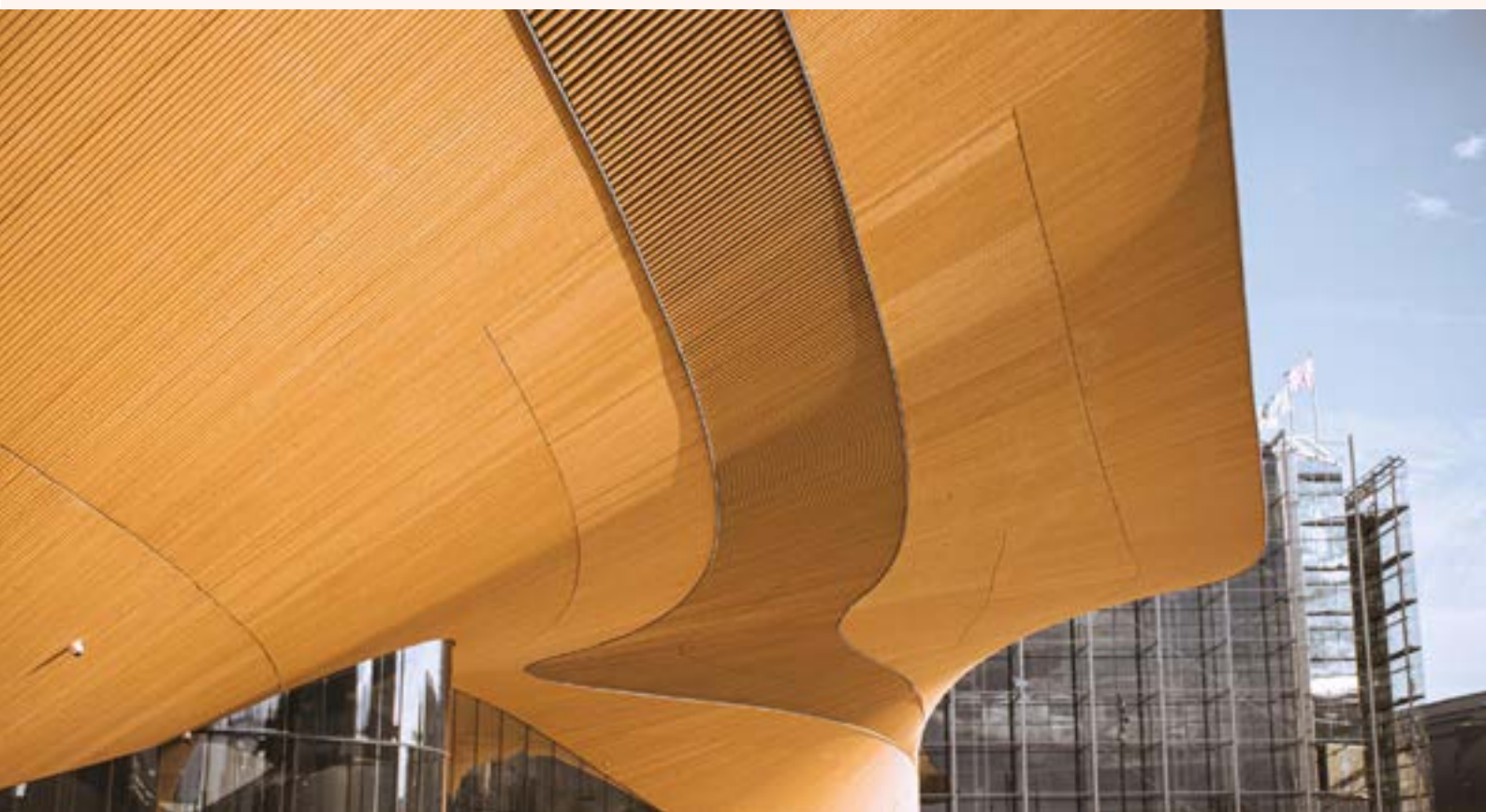
Our Code of Conduct sets clear expectations on the way we do business and it provides the ethical standards that help us make the right choices every day. We may think of the Code as a compass, with our values helping us to keep course and guiding our daily decision making.

The Code applies to every one of us across the organization, including employees in our subsidiaries, hired consultants, and others acting on behalf of the company. I encourage everyone to familiarize with the Code – let's ensure together that the content and spirit of our Code are 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

Tietoevry's Code of Conduct (the Code) outlines what is expected from us as individuals and as a company according to our commitment to ethical conduct and international standards. We can think of the Code as a compass, with our values helping us to keep course and guiding our daily decision making.

The Code is intended to guide every one of us in our daily activities and be the base for our decision making and actions. It covers the following core areas: Doing business ethically, respect for others and acting responsible in the marketplace – topics described have additional detailed policies, rules and guidelines in place for further guidance.

If you are uncertain how to act in a given situation, please stop for a moment to consider Tietoevry's values. When in doubt, please consult a colleague, your manager, your HR partner or our Group Compliance Officer for help in interpreting the Code.

Business is all about trust. And trust is built on integrity. So your decision matters.

1.2 Scope and applicability

Our Code outlines ethical behaviour standards for all Tietoevry employees, hired consultants, board members and other company representatives in all the countries where we operate. All Tietoevry subsidiaries and joint ventures are covered by the Code.

Tietoevry managers are responsible for ensuring that both the content and the spirit of the Code are communicated, understood and applied in daily work across our organization. Managers should aim to foster an environment where people feel secure to raise concerns and report any behaviour suspected of being non-compliant.

The Code can be revised at irregular intervals, so please keep yourself updated on any possible changes. You should also share these updates with all the suppliers and business partners you interact with.

Tietoevry abides by the local laws and regulations of each country and jurisdiction in which we operate. In situations where the law does not provide specific guidance, Tietoevry applies its Code of Conduct. In cases of a conflict between relevant laws and the principles described in this Code, the higher standard always prevails. More detailed policies, rules and guidelines are in place for most areas.

1.3 Violations

At Tietoevry we have zero tolerance for violations of our Code. Failure to comply with the Code and its related rules is taken very seriously. Disciplinary action – including dismissal and prosecution – may be applied in cases of violations.

1.4 Speak up!

All of us are responsible for drawing attention to matters that may compromise the Code, our rules, or local laws. Failure to speak up is itself a breach of the Code. You do not need to be certain of a violation or have evidence of it in order to report a concern, as we have a process in place to look into any issues raised.

TietoEvry is committed to a culture where everyone should feel safe reporting concerns. Reporting ensures that violations are addressed and improves the way we do business, so that we always act legally and ethically. TietoEvry prohibits retaliation against anyone who reports concerns and violations in good faith.

There are several channels through which to seek guidance or to report a concern:

Your manager or HR partner

Managers help their team members to understand and apply the Code, as well as any supporting rules and relevant local laws. Many concerns can be resolved by consulting with your manager. In cases where employees may not be comfortable doing so, we recommend contacting an HR partner.

Our Group Compliance Function

Suspected violations should be reported to TietoEvry's Compliance function. We ensure confidentiality and, if requested, anonymity too. You can report violations, ask questions or raise concerns directly with the Group Compliance Officer. Any communication with the Officer is kept confidential within the compliance team and is regarded as legal privilege.

The whistleblowing channel

Reports of violations may also be made through our external whistleblowing channel <https://tietoevry.whistleblownetwork.net/frontpage>. All reports are confidential and can be made in full anonymity. For more information on how a whistleblowing notification is handled, please consult the Whistleblowing Rule on the TietoEvry HUB.



2. Do business ethically – the Tietoevry way

The importance of business ethics is increasing all the time. Tietoevry is committed to acting with integrity and we have zero tolerance for any unethical behaviour. Doing business ethically means that we apply the “precautionary principle” in everything we do. In other words, we are careful when there is a reason to believe that a potential action may negatively impact a person’s health or wellbeing, society, or the environment.

All employees, board members and company representatives should act in the best interests of Tietoevry, and not based on personal considerations or relationships. All decisions and external commitments must be made at the appropriate level and in accordance with Tietoevry’s decision-making principles

2.1 Anti-Corruption and improper payments

Tietoevry opposes all forms of corruption and improper payments. This refers to giving or receiving something of value to influence a decision or a transaction.

Employees and representatives of Tietoevry are strictly prohibited from offering or receiving favours, valuable gifts, free trips, illegal payments, kickbacks, or any items of value that may inappropriately influence a customer, supplier or business partner to order, purchase or use our products and services. This rule applies irrespective of whether such incentives were to be provided directly, indirectly through a third party – such as an agent, supplier, business partner or consultant – or in the form of a sponsorship or charitable contribution.

Business fraud of any kind, falsification of financial statements, abuse of power or offering, giving, promising, extorting or receiving illegal benefits are all strictly prohibited. Facilitation payments – i.e. small payments or gifts made to government officials for the purpose of influencing a government action – are regarded as bribes and are strictly prohibited

2.2 Gifts, hospitality and similar benefits

Tietoevry has a firm policy towards gifts, remuneration and activities that may be perceived to include elements of a gift.

We do not offer or accept gifts, business courtesies or other benefits – such as hospitality or covering of expenses – where such incentives may influence or appear to influence business decisions, our independence, our integrity, or our ability to make objective decisions in the best interests 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 these could be perceived to be 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 these may differ from Tietoevry’s.

When Tietoevry or our employees host or attend an event, then gifts and similar benefits

of a personal nature, as well as 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 bears the cost.

Tietoevry does not make any charitable donations to or on behalf of our customers.



2.3 Conflicts of interest

Employees and representatives should avoid any situation where a personal interest conflicts or appears to conflict with the interests of the company.

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

Should the risk of a conflict of interest arise, or if you are unsure whether a given situation represents a conflict of interest, please notify your manager immediately.

2.4 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 working with start-ups and sole proprietorships.

Engagement in external duties and positions must not affect your work at Tietoevry, or otherwise come into conflict with Tietoevry's business interests. Board membership, other duties or interests in external business or organizations, high profile non-profit or similar organization should be discussed with your manager.

Engaging in activities outside your normal job is accepted, but always discuss with your manager to ensure it does not create a potential or perceived conflict of interest. Upon request, you should provide information to Tietoevry about your sideline occupation. Tietoevry may require you to completely or partially cease a sideline occupation that, in the view of Tietoevry, acts as an obstacle to our work..

2.5 Fraud

Tietoevry is committed to prevent and detect all forms for fraud. Fraud is a type of theft by intentional deception 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.

2.6 Confidentiality

Tietoevry employees and other people associated with the company have a duty of confidentiality by law and / or written agreement in accordance with this Code of Conduct. The misuse or disclosure of any confidential information about Tietoevry, our customers, suppliers, business partners, or another third party is prohibited.

This means we must keep confidential any non-public information that relates to Tietoevry, as well as any other information that comes to our knowledge related to Tietoevry or any affiliated entity, customers or business partners that is not commonly known. Such information may be related to the business environment, operations, products, product development, or other areas.

Further, we must exercise caution when discussing internal matters in order to avoid being overheard by persons not associated with the company. This duty of confidentiality applies not only externally, but also towards other employees at Tietoevry, who are not allowed to get the information. Our duty of confidentiality applies even after the termination of employment or after the end of a contractual relationship with Tietoevry, in accordance with the locally applicable periods.

2.7 Insider information and trading

As a publicly listed company, Tietoevry is subject to strict rules regarding the handling of insider information. This is any information not known in the market but that could have a material effect on the price of securities, or influence a decision to buy, sell or hold a security.

2.8 Safeguarding corporate assets

All of us at Tietoevry should use the company's tangible and intangible assets only for legitimate business purposes, and we should protect these assets from loss, damage or unauthorized use. We must always observe security requirements concerning access to and the use of Tietoevry's physical facilities and resources, as well as online documents and other electronic resources. All employees are expected to comply with applicable security policies.

Intellectual property – including but not limited to documentation, source code, scripts, integrations, knowhow, methodology, concepts and ideas – shall be protected and managed in the interests of Tietoevry and in accordance with relevant regulations and guidelines. We should also respect the intellectual property rights and trade secrets of others, and avoid infringement upon such rights.

2.9 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. Every employee, partner and subcontractor should behave in a security-conscious manner and report any suspected security incident you become aware of.

Please familiarize yourself with and adhere to Tietoevry's Security Policy and User Security Rule, which set out the security principles and responsibilities for all employees and contractors to follow. Keep your security awareness and skills up-to-date by participating in the security training sessions that Tietoevry offers.

2.10 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 personal data from unauthorized access or unintended disclosure.

Keep your privacy awareness and skills up-to-date by participating in our mandatory privacy training courses, as well as other non-mandatory courses offered by the company. Please report any suspected personal data breach you may become aware of.

2.11 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.

2.12 Money laundering and terrorist financing

TietoEvry is opposed to all forms of money laundering or terrorist financing. As such, we take steps to prevent financial transactions with any company or subsidiaries suspected of supporting terrorist activities or laundering money.



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 treats people on equal terms and does not allow any discrimination on the basis of sex, gender identity, nationality, religion, belief system, race, age, mental or physical disability, marital status, sexual orientation, political opinion, membership or non-membership in unions, or social or ethnic origin.

Our strong opposition towards any discrimination applies not only to recruitment, but to all decisions relating to training, promotion, continued employment and working conditions in general, as well as to our relationship with suppliers, customers, business partners and other third parties.

We are proud to promote a culture of equal opportunities and diversity. We aim to create an inclusive workplace where differences are welcomed, respected and employees are given equal opportunities to grow. All managers at Tietoevry should work actively to ensure diversity in their teams, including a balanced gender composition and the employment of people from the countries in which Tietoevry operates.

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 freedom of association and the right to collective bargaining. All employees have the right to be or not to be members of a trade union and to bargain collectively. No disciplinary action is taken against employees who choose or choose not to organize or join an association. As employees of TietoEVRY, we must not interfere or in any way obstruct other employees' freedom of association, or right not to join an organization. TietoEVRY's employee representatives must be allowed to carry out their functions unhindered in the workplace.

3.5 Fair employment conditions

TietoEVRY respects and upholds everyone's right to fair and favourable working conditions. We respect the right to rest and leisure as part of supporting a healthy work-life balance, including working hours that comply with all applicable laws and industry standards. To support work-life balance, employees are offered flexible working conditions wherever possible. TietoEVRY managers are encouraged to set an example in their approach to work-life balance, and we should all respect our colleagues' needs for such balance.

As a responsible employer and business partner, we respect fair and reasonable compensation principles. This means paying a living wage, or compensating in line with industry standards – whichever is higher. Deductions from fixed salaries or wages as a disciplinary measure are not permitted.

3.6 Health and safety

Our employees' well-being is essential to TietoEVRY. As such, we endeavour to promote good health and a safe working environment in compliance with internationally recognized standards. We all share the responsibility for achieving this goal.

We should do our best to control hazards and should take all necessary precautions to prevent accidents and occupational diseases. Our working environment must be free of all forms of bullying, harassment and acts of violence; including physical, verbal or written harassment (whether at the office, online, or outside the office). We do not tolerate any behaviour that can be perceived as degrading or threatening.

3.7 Alcohol and drug abuse

Ensuring a safe working environment free of alcohol and illegal drugs is a key principle for TietoEVRY. We care for each other, and therefore we encourage all employees to seek help for alcohol and/or other substance-abuse problems by speaking with their manager or HR partner. Company hospitality events and social activities are exempt from sobriety requirements, but alcohol may not be consumed in a manner that risks harming the employee in question, colleagues and/or TietoEVRY's interests. Non-alcoholic alternatives must always be available

4. Act responsibly in the marketplace

At TietoEVRY we seek to earn and maintain the respect and trust of all our stakeholders. As company employees and representatives, we should treat everyone we encounter in the marketplace with the same ethical standards as we treat our colleagues.

4.1 Responsible solutions

As developers of digital futures, we understand that what we create has an impact on people's lives and we take this responsibility seriously. We respect, promote and support human rights by striving to carry out proper due diligence and responsible decision-making during the entire lifecycle of a solution.

We seek to understand and collaboratively address any ethical or human-rights related considerations that may arise from the use of our solutions. This includes risks to all human rights, and risks to the right for privacy and non-discrimination. In cases where serious ethical risks cannot be mitigated, TietoEVRY will stop the release and delivery of the solution in a responsible manner.

We also understand that we are developing solutions for a broad range of users and end-users. As such, our solutions are to be designed to be accessible to all users – regardless of their physical or cognitive abilities.

As employees of TietoEVRY, we need to consider the ethical and human rights risks of our solutions in their normal usage, and also in cases of potential misuse. You should raise a concern if you suspect that such risks have not been properly addressed.

4.2 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 are granted leave from their work in accordance with relevant laws and agreements.

4.3 Fair competition

Antitrust and competition laws are in place to promote fair competition. As such, we should not 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 demeans the products or services of our competitors.

4.4 Responsible communication

TietoEVRY is a publicly traded company that complies with regulations governing public communications to investors and the general public. All information from TietoEVRY should be reliable, correct, and comply with the highest professional and ethical standards. Communication with media, public or financial markets takes place in accordance with defined guidelines and procedures, complying with the rules and practices applicable to publicly listed companies. We reflect these principles in all activities in our communication channels, including social media. If contacted by a journalist, analyst or similar – and if you are unsure whether you can or should give a statement – please consult the TietoEVRY Newsdesk for guidance.

4.5 Relations with customers, suppliers and public authorities

We engage our customers with insight, respect and understanding. We always try to fulfil their needs in the best possible manner, within the ethical guidelines that apply to our business. We also treat suppliers impartially and fairly. Suppliers in competition for contracts with TietoEVRY should be able to trust our vendor selection processes. We engage with public authorities in an appropriate and transparent manner.

4.6 Accounting and reporting

All accounting and reporting by TietoEVRY is conducted in accordance with generally accepted financial principles. Our accounting practices ensure that business transactions are documented and reported in full, accurately and in a timely fashion. All financial disclosures are transparent, relevant, timely and understandable.

4.7 Responsible procurement

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

4.8 Environment

TietoEVRY is committed to conducting business in a sustainable way and continuously improving our environmental performance. We recognize that our business activities can have both a negative and a positive impact on the environment.

Negative impacts are related to energy consumption and greenhouse gas emissions from our offices, data centres, business travel, and procurement activities, as well as from our use of natural resources. Positive impacts can be achieved through enabling the potential of our digital technologies to help our customers and society at large improve their climate performance and resource efficiency in their journey towards a decarbonized and circular economy.

TietoEVRY supports a precautionary approach to environmental challenges and to continuously improving our environmental performance. We are committed to Science Based Targets to limit the global warming of the planet to 1,5 degrees compared to the pre-industrial level, and we are constantly evaluating and implementing ways to reduce our own emissions. TietoEVRY follows circular-economy practices and we observe the entire product life-cycle perspective – aiming to save natural resources and reduce environmental impacts related to energy and material usage.

TietoEVRY complies with applicable environmental laws and regulations as well as relevant local and internationally recognized standards. Our precautionary approach to environmentally responsible ways of conducting business extends along our whole value chain.

All TietoEVRY employees have a role to play in living up to our commitments in our daily work. Together we share responsibility for our environmental performance and best practices. Our managers and leaders have a special obligation to ensure this commitment is actively adhered to and clearly communicated.

5. Document information

5.1 Governing data

Owner	Kia Haring, VP, Head of Communications, Sustainability, Brand and Marketing
Editor	Erika Eriksson, Sustainability manager
Next review	2024.01.01
Approver	Kimmo Alkio, President and CEO
Effective date	2023.01.01
Reviewed	Yearly
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, United Nations Guiding Principles for Business and Human Rights, UN Rio Declaration on Environment and Development, the UN Convention against Corruption, UK Bribery Act, US Foreign Corrupt Practices.

5.2 Version history

Version	Approval date	Owner	Manager	Editor	Approved by	Change history
V1.1A	2022-12-20	Kia Haring	Ida Bohman Stenberg	Erika Eriksson	Kimmo Alkio, CEO	Updates based on regulatory requirements
V1.0	2020-02-20	Kia Haring		Ulrika Lagerqvist von Unge	Kimmo Alkio, CEO	Harmonization of Tieto and ENVY Code of Conducts

TietoEvry creates purposeful technology that reinvents the world for good. We are a leading tech company with a strong Nordic heritage and global capabilities. Based on our core values of openness, trust and diversity, we work with our customers to develop digital futures where businesses, societies and humanity thrive.

Our 24,000 experts globally specialize in cloud, data and software, serving thousands of enterprise- and public-sector customers in more than 90 countries. TietoEvry's annual turnover is approximately EUR 3 billion and the company's shares are listed on the NASDAQ exchange in Helsinki and Stockholm, as well as on the Oslo Børs. www.tietoevry.com

