



SOLITA

Anti-bribery and Corruption Policy



Version history

Version	Date	Author	Changes
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1 Purpose and scope

In this document, Solita/our/we/Company refer to Solita Holding Oy (hereinafter Solita) and all its subsidiaries. The purpose of this Anti-bribery and corruption policy (hereinafter policy) is to raise employees' awareness of the risk of bribery and corruption and prevent bribery, including any kind of facilitation payments, and acceptance of bribery as stated in Solita's Code of Conduct. We must make sure that we conduct our business with integrity, the highest ethical standards, and in compliance with anti-corruption laws, rules, and regulations.

Solita has zero tolerance for bribery and corrupt activities. All forms of corruption, including but not limited to extortion, cronyism, bribery, facilitation payments, nepotism, fraud and money laundering, are strictly forbidden in all our activities.

The policy is global and covers all Solita's legal entities. It applies to all employees and directors of Solita and its subsidiaries (hereinafter employees) as well as partners acting on behalf of Solita (hereinafter partners), who are expected to and whose responsibility is to be aware of and fully comply with the content of the policy, including subsequent changes. Solita's responsibility is to provide trainings on a regular basis.

The policy has been approved by Solita's CEO.

2 No bribery or facilitation payments

Solita has zero tolerance for bribery, facilitation payments and corrupt activities.

Bribery, including any kind of facilitation payments, and acceptance of bribery is strictly forbidden in all our activities. A facilitation payment (also known as "grease" payment) is typically a small payment to a government official to ensure or speed up a routine government action (such as processing papers, issuing permits, or similar official actions).

Solita employees and partners may not accept, give, promise, offer, request, or agree to accept authorize payment of anything of value that exceed reasonable hospitality as part of normal business to obtain or keep business or to secure some other improper advantage. An improper (or undue) advantage refers to a benefit of some kind that a company or individual is not legally entitled to and that it has obtained through illegal means. Solita employees and partners may never accept monetary gifts, including cash and securities. We never accept or give gifts that could damage Solita's reputation or general confidence in Solita or Solita's employees and partners. Furthermore, we do not accept repeated gifts from the same people or organisations.

3 Gifts, Travel and Hospitality

In certain circumstances, the giving of gifts, the payment of travel expenses, and the providing of entertainment and other hospitality, can be considered a bribe if it is done in return for receiving an improper advantage.



Participation in an external event organised by a supplier or other partner is acceptable if there is a real and documented business-related reason for participation, the costs of participation are reasonable and participation is not violating this policy or possible local guidelines. In these situations, Solita will pay the travel and accommodation costs. Participation and possible travel expenses must be approved by a supervisor before the event. If you need support or guidelines, you can contact Solita's Finance team or the General Counsel.

It is also important to remember that many of our customers, especially within public administration as well as public authorities, have strict guidelines with regard to the gifts their employees can accept. We check our customers' guidelines and make sure beforehand what is appropriate.

Also remember the country specific rules: in some countries minor hospitality can be considered as bribe for example when given that to government officials. If you are uncertain of the acceptable level, ask before you act. You can contact ethics@solita.fi or our General Counsel for further guidance.

4 Conflicts of interest

A conflict of interest refers to a situation in which our personal interests or the interests of our friend or family member affect our ability to make the best possible decision from Solita's perspective or prevent us from making an objective decision. A conflict of interest may arise, for example, during the recruitment process, when selecting Solita's partners or if we are offered a board member's position or an advisor's role in another company. All potential hires should go through Solita's normal employee hiring process, and no employment candidate should receive preferential treatment or consideration based on the request of a third-party or internally who is able to provide a benefit to Solita or to colleague. For further information refer to Solita's Recruitment guidelines.

5 Donations

Charitable donations can be considered a bribe when they create a benefit for an individual in return for an improper advantage. When making charitable contributions, we always ensure that these do not benefit the government officials or political parties. As stated in the Code of Conduct, we are a politically and religiously neutral company. As a company, we are not involved in political or religious activities and do not support such activities financially.

6 Accurate books and records

Solita implements the appropriate controls to make sure our financial data is presented accurately and our transactions are reported timely and in an objective and consistent manner.



All payments, gifts and other compensation must be accurately recorded in a timely manner and in reasonable detail in the corporate records. No undisclosed or unrecorded accounts may be established for any purpose. False, misleading, incomplete, inaccurate or artificial records are prohibited. Creation of side agreements is prohibited, and our contract documents must reflect the totality of our agreements and must include all terms and concessions as agreed by both Solita and our counterparties.

7 No retaliation

Potential violations of the policy are always investigated confidentially, and no disciplinary measures will be taken before completing the investigation. Should a violation of the policy be deemed to have occurred, appropriate disciplinary measures will be taken.

We do not tolerate any retaliatory measures against a person who reports a suspected breach in good faith. Naturally, insincere notifications are not accepted, either.

Always ask before acting and look for guidance if you are uncertain. You can ask guidance from Solita's General Counsel or by contacting ethics@solita.fi