



Doing the Right Thing

- The Solita Code of Conduct

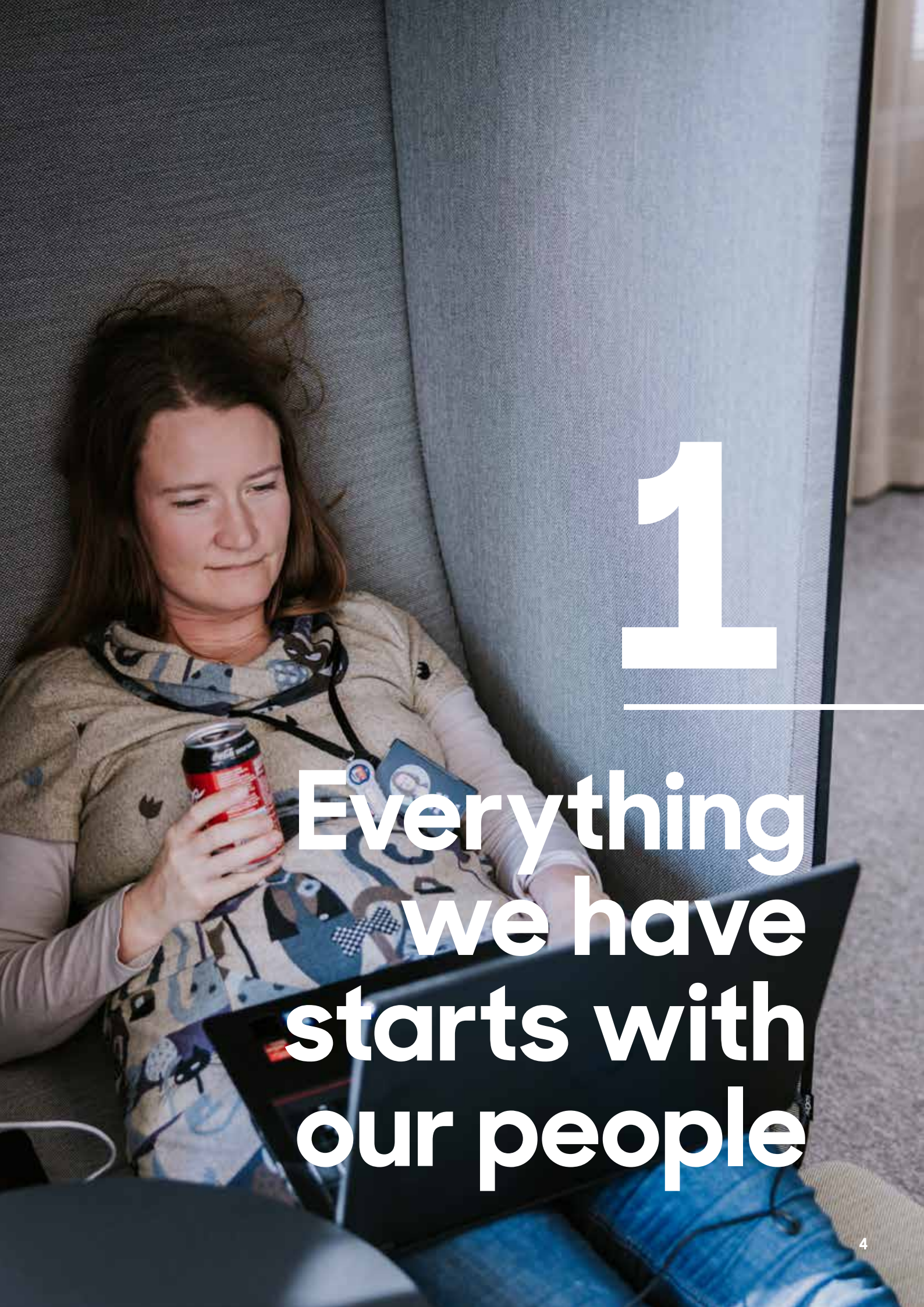


SOLITA

Table of Contents

1 EVERYTHING WE HAVE STARTS WITH OUR PEOPLE	4
2 LIVING THE CODE	6
3 WE ACT RESPONSIBLY	8
3.1 We build trust	9
3.2 We treat others respectfully	9
3.3 We promote equality, diversity and non-discrimination	10
3.4 We act in the best interest of Solita and avoid conflicts of interest	10
3.5 We respect our customers' code of conduct	10
4 WE SAFEGUARD SOLITA'S BUSINESS AND BOTH TANGIBLE AND INTANGIBLE ASSETS	11
4.1 We take care of Solita's premises and equipment	12
4.2 We take care of Solita's finances	12
4.3 We contribute to Solita's business	12
4.4 We safeguard our brand	13
4.5 We represent both ourselves and our employer on social media	13
5 WE PROTECT OUR CUSTOMERS' DATA AND BUSINESS	14
5.1 We take data privacy seriously	15
5.2 We follow good information security practices	15
6 WE DO BUSINESS RESPONSIBLY	16
6.1 We choose our customers and partners responsibly	17
6.2 We comply with laws and regulations	17
6.3 We do not accept money laundering or corruption	17
6.4 As a company, we do not participate in political or religious activities	18
6.5 We respect our employees' freedom of speech and freedom of association	18
6.6 We compete fairly	19
6.7 We safeguard our personnel's health, safety and well-being	19
7 WE TAKE RESPONSIBILITY FOR THE ENVIRONMENT AND SUSTAINABLE DEVELOPMENT	20
7.1 We prefer public transport when travelling	21
7.2 Our office locations and practices help save natural resources	21
8 WE BUILD A BETTER SOCIETY BY DEVELOPING INFORMATION WORK	22
9 WE SPEAK UP	24





1

**Everything
we have
starts with
our people**



Our culture and values – a caring, easy-going attitude, courage and passion – provide a strong backbone for our operations.

As we grow and become more international, it is important to make sure that we continue operating in a responsible way and in accordance with our values, complying with the applicable legislation in different countries and also discussing how our values are implemented in our daily work. A good reputation and our customers' and partners' trust can take years to build – but can be lost quickly.

This **Code of Conduct** sums up Solita's principles of responsible operation, to help us navigate in everyday situations and determine what is right, ethical and responsible. Please read it carefully. The laws of different countries set the minimum requirements, but in many situations responsibility and integrity extend beyond what is required by law. In addition to our own activities, we have to be aware of the activities of our customers, partners acting on behalf of Solita and other business partners.

Our Code of Conduct is not a jungle of rules and does not provide an exhaustive list of all situations. However, by following these principles and by discussing the matters together we can hopefully prevent some mistakes from happening and support practices that we want to cherish. When in doubt, please do not hesitate to ask. We want to foster a culture where asking questions and raising concerns is encouraged and expected.

Our Code of Conduct will continue to evolve. If you notice something that should be developed in terms of the Code of Conduct, please contact ethics@solita.fi, the Solita communications team or me directly.

The Solita Code of Conduct is intended for all employees of the Solita Group and its subsidiaries as well as partners acting on behalf of Solita, and they are expected to comply with and safeguard our Code of Conduct. Together we can make sure we are fostering a company that both we, our customers and our partners can all be proud of.

OSSI LINDROOS
PRESIDENT & CEO

A woman with blonde hair, glasses, and a headset is working at a computer in an office. She is wearing a dark floral patterned top and a red lanyard. Her hands are on a white keyboard. A white mouse is on a black mousepad to the left. The background is a blurred office environment with shelves and other people.

2

Living the Code

Preventing possible breaches - whether intentional or unintentional - is often easier than addressing the consequences afterwards. All Solita employees and partners acting on behalf of Solita are asked to comply with and safeguard our Code of Conduct.

The basic principles of responsible conduct are simple. We comply with all relevant laws and act responsibly and according to our values in all our projects. Furthermore, we aim to ensure that our customer relationships as well as the products and services we develop serve a good purpose - a better life, in one way or another.

When making decisions in your daily work, we encourage you to consider your decisions and conduct from three perspectives: from the perspective of the customer, the business as well as the people affected, both in the short and long term.

If you are unsure whether a decision is ethical, we encourage you to look at the bigger picture and examine the decision from different perspectives.



Is the decision in compliance with Solita's values and our Code of Conduct?



Would you like to read about the decision in the media? Would it be OK if it became public?



Would you like it if someone else had made a similar decision?



Could your decision be used as an example with regard to future decisions?

If the answer to any of these questions is "no", you should either not make the decision, or you should examine it more. If you are not sure, it is good to discuss the matter with other Solita employees and, for example, with your team lead.

Solita employees in managerial positions are expected to lead by example: please aim to set a good example with your own behaviour on the principles and values we want to cherish. It is

also important that you help make sure that our employees are aware of the Code of Conduct and our common practices and understand their importance in our daily operations. If you are in a managerial position, you have a particular responsibility to address issues you notice and to proactively encourage joint discussions if something causes concern within your team or our people in general. In addition, you can help find solutions.

A blurred street scene at dusk or dawn, featuring tram tracks on a cobblestone street. The street is lined with tall, multi-story buildings. In the distance, there are blurred lights from cars and street lamps, creating a bokeh effect. A large, white, stylized number '3' is overlaid on the right side of the image.

3

**We act
responsibly**

3.1

WE BUILD TRUST

All Solita employees and partners acting on behalf of Solita build our image in the world through their actions and words. We are all responsible for building trust among our customers and it cannot be outsourced to someone else. We want to be known for being solid professionals who can be trusted and act in accordance with our values. We keep our promises, we guide our customers in the right direction and we care about our customers and their businesses. Working with us is natural and straightforward. We, of course, comply with all laws and rules and act responsibly and ethically.

When representing Solita, we act professionally in all situations – at our office, at our customers' premises, on public transport, at seminars, training events and joint events with our colleagues and customers.

3.2

WE TREAT OTHERS RESPECTFULLY

It is important to us that everyone feels safe and accepted at work. We do not tolerate any kind of psychological or physical bullying, harassment or inappropriate behaviour. **We have a zero tolerance policy** towards psychological harassment, inappropriate behaviour and sexual or gender-based harassment. This is only possible if we are aware of our common rules and respect them. We are all different, so something may be normal to you but someone else may find it unpleasant. Open discussions will help you make sure that those around you feel comfortable, also in situations where you are not sure about the correct way of acting.

Bullying, harassment and inappropriate behaviour may occur in different ways. Such behaviour includes insulting another person through words, actions or attitudes, defamation and name-calling, threats and intentional exclusion from joint activities. Examples of sexual and gender-based harassment include remarks relating to the person, their gender or appearance, propositioning, inappropriate or suggestive messages and physical touching.

3.3

WE PROMOTE EQUALITY, DIVERSITY AND NON-DISCRIMINATION

Together we can create an environment where everyone feels comfortable, valued and included. We treat each other, our customers and partners in an equal and nondiscriminatory manner regardless of one's background, gender, gender identity, gender expression, age, origin, nationality, language, religion, beliefs, opinions, political activity, trade union activity, family relationships, state of health, disability, sexual orientation or other personal characteristics.

We make all decisions regarding our personnel, for example in terms of recruitment, pay determination, promotions and filling of open positions, on the basis of an individual's expertise and abilities. The above-mentioned personal characteristics should not affect our decisions.

At Solita, everybody should feel comfortable to be themselves, 'with all their perfections'. Diversity of all kinds is our strength; be it skills, nationality, beliefs, gender or sexual orientation. It is embedded in our everyday culture, our core values and our employer promise. We care about each other, people and society as a whole. We focus on changing the world, not people.

Diversity matters, because it leads to better solutions, more profitable outcomes and higher well-being. It is something that should be cherished. We cherish it.

3.4

WE ACT IN THE BEST INTEREST OF SOLITA AND AVOID 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.

Avoiding situations in which your personal interests may conflict with Solita's interests is advised, but not always possible. If you suspect or notice a conflict of interest, please notify your team lead immediately and, if necessary, step aside from the situation. Never use your position at Solita to gain such personal benefit that you would not otherwise gain either for yourself, your family or anyone else. Taking personal advantage of business opportunities that legitimately belong to Solita and using Solita's property to gain personal benefit are not acceptable. Transparency and open discussion normally work well here, too, so please speak up if you feel you might have a conflict of interest at hand.

3.5

WE RESPECT OUR CUSTOMERS' CODE OF CONDUCT

We work with a variety of customers and often at their premises. In these situations, we also comply with and respect our customers' code of conduct in so far as it is different from ours, while keeping our own responsibility in mind. We also respect everything included in our customer agreements. We expect our customers to treat our consultants professionally.



4

**We
safeguard
Solita's
business and
both tangible
and intangible
assets**



**We are all important
ambassadors of the
company.**

4.1

WE TAKE CARE OF SOLITA'S PREMISES AND EQUIPMENT

We treat Solita's premises and other property with due care and respect, as if they were our own personal property.

Solita's information systems, data, hardware and software are Solita's property and intended to be used in connection with Solita's business. We exercise good judgment when using company-provided technology resources, and use them for personal reasons only if it does not interfere with our job responsibilities or harm our work environment. Please do not install, for example, cryptocurrency miners, torrent software or non-licensed software, games or films on the company devices.

4.2

WE TAKE CARE OF SOLITA'S FINANCES

We can all take care of Solita's finances within the scope of our roles and responsibilities. What this means is that we, for example, spend Solita's funds wisely and record our billable and non-billable hours and expenses accurately, regularly and according to Solita's guidelines.

To sail smoothly, 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. You can find the guidelines for the company expense policy, hourly reporting and travel policy in the intranet.

4.3

WE CONTRIBUTE TO SOLITA'S BUSINESS

We understand that our own actions affect Solita's business, and that we are all responsible for the financial well-being of our company. The satisfaction and success of our customers is vital for Solita.

People are Solita's most precious asset. Therefore it is up to all of us to take responsibility for maintaining our own and our team members' well-being and for developing our skills. We respect the work of our colleagues by doing our best - and by expecting quality from others.

4.4

WE SAFEGUARD OUR BRAND

Our customers' trust and responsible practices are essential for successful business. Our brand and sub brands are an important part of our intellectual capital. The brand is the sum of all the knowledge, feelings and values associated with our company. The brand promises are fulfilled through our daily work and encounters – projects, events, online activities and face-to-face meetings. In addition to our own communications, all these encounters affect our brand.

It takes time to build trust but it only takes a moment to lose that trust. Situations that could damage the image associated with us should be discussed preventively within the company. Both the group leadership team and our communication specialists help coordinate crisis communication situations. Responsible activities and quick responses also carry us through challenging situations and often help us prevent them from arising.

4.5

WE REPRESENT BOTH OURSELVES AND OUR EMPLOYER ON SOCIAL MEDIA

We encourage and coach Solitans to use social media and build our brand also in public appearances, such as speaking engagements – we are all important ambassadors for the company. When posting on social media, please remember that most of our customer work is extremely confidential and the non-disclosure agreements binding the company, including the provisions regarding liability for damages, apply to all Solita employees. When talking about our customer cases, check the situation of the customer relationship and whether it can be used as a reference. On our website you can find public case descriptions approved by our customers.

We act in a responsible and constructive manner on social media and do not defame our competitors or partners. We do not have a strict set of rules for our social media ambassadors. Instead, we hope that before publishing on social media or discussion forums, you will consider the following aspects: Will your text or comment make your colleagues proud? Is it in line with our company values? Would it be ok, if your comment was made public and appeared in the media? Any news published on our social media channels or website can always be shared.

In addition to our responsible practices and the confidentiality of our customer work, we are all bound by the Employment Contracts Act's provisions regarding confidentiality and loyalty to take our employer's interests into consideration when working and also partly during free time.



5

We
protect our
customers'
data and
business



**We do not
collect
unnecessary
personal
information.**

5.1

WE TAKE DATA PRIVACY SERIOUSLY

We take the privacy of our data and our customers' data seriously. Personal information and data is only accessed when there is a legitimate reason and it is only shared with people involved in the case.

We do not collect unnecessary personal information ourselves or on behalf of our customers as mandated by the legislation and GDPR guidelines. It is our responsibility to help the data owner, and our role as the data processor is specified in contracts as required by the GDPR.

Sensitive information is always encrypted when stored or transferred to minimise the damage from possible security breaches.

5.2

WE FOLLOW GOOD INFORMATION SECURITY PRACTICES

Keeping our customers' data and the data on our potential future employees confidential and secure is of paramount concern to us. We make every effort to ensure that this information is handled appropriately and only by the persons privy to that information.

All Solita employees participate in mandatory security training to make sure everyone follows good basic security principles. Additional security training and tools are provided as needed.

Only computers and systems approved by Solita IT and Solita Security can be used for work purposes. Personal accounts and devices are not used. All tools provided by IT are protected and monitored to prevent and catch security issues before the situation escalates.

We have a defined security and risk management process, similar to ISO 27001, for managing our security policies and ways of working. We continually adjust and develop our methods as the security landscape shifts.

6

We do business responsibly

Both being a good employer and maintaining great customer relationships are based on trust. Sustainable business cannot be built on unethical activities. Responsible business includes, for example, respecting laws and human rights, treating our employees respectfully, ensuring we operate in an environmentally friendly manner as well as enforcing anti-corruption activities.

Since 2019, we have been a member of the UN Global Compact initiative, which is the world's largest corporate sustainability initiative. The participants include over 12,000 business and non-business participants in over 150 countries. As a Global Compact participant, we are also obliged to report on our progress regarding sustainability on an annual basis.

www.unglobalcompact.org/about

6.1

WE CHOOSE OUR CUSTOMERS AND PARTNERS RESPONSIBLY

When using partners that act on behalf of Solita, we always ensure that they meet the obligations based on the Act on the Contractor's Obligations and Liability (Tilaajavastuu in Finnish). As an example, we make sure that the partner fulfills their statutory obligations as an employer, such as pays taxes and salaries.

When selecting new customers, we use our best effort to investigate and evaluate the risks and opportunities involved. We realise that customer selection in a global setting is challenging and, in some cases, cannot be discussed with complete transparency even internally (NDAs, non-compete clauses and regulatory restrictions may apply). To use our resources wisely, we limit our responsibility to the customer's business and the organisation itself, excluding ownership structures or other entities behind the customer. We will not systematically restrict ourselves by geographical areas, governance models or industries, but we will always make our best effort to make sure that the work we do creates ethical and positive impact. However, if a business/customer is revealed to be something else, we will make necessary actions to be faithful to our values. We value the diversity of our community, and this is why an individual employee has the right to refuse a customer project, if the project conflicts with their personal values.

As a company, we respect human rights and strongly condemn all activities that are against the law or violate human rights. We do not accept the use of child labour or human trafficking.

6.2

WE COMPLY WITH LAWS AND REGULATIONS

We comply with applicable national and international legislation as well as other regulations and require the same from our partners acting on behalf of Solita.

6.3

WE DO NOT ACCEPT MONEY LAUNDERING OR CORRUPTION

As a company, we are committed to complying with the anti-money laundering legislation.

Bribery, including any kind of facilitation payments, and acceptance of bribery is strictly forbidden in all our activities. We do not accept or give valuable gifts or gifts that exceed reasonable hospitality as part of normal business. We 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. Furthermore, we do not accept repeated gifts from the same people or organisations.

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 against Solita's anti-bribery guidelines 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.

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.

6.4

AS A COMPANY, WE DO NOT PARTICIPATE IN POLITICAL OR RELIGIOUS ACTIVITIES

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. As a company, we may support activities that promote diversity, equality and non-discrimination. We do not consider diversity promoting events, such as Pride, as political or religious activities, but as a means to support human rights.

6.5

WE RESPECT OUR EMPLOYEES' FREEDOM OF SPEECH AND FREEDOM OF ASSOCIATION

As a company, we respect our employees' freedom of speech. As employees, we understand that we are bound by confidentiality agreements with our customers as well as the obligation of loyalty towards Solita. We comply with them as well as the company's data classification and processing instructions. We do not use or disclose, during or after our employment relationship, any trade or business secrets and/or any other confidential information that we have been trusted with or we have otherwise obtained. This applies to our company's own trade and business secrets as well as those of our principals and customers.

As employees, we understand that freedom of speech also includes respectful and good behaviour when communicating with each other face to face or via digital channels.

All employees have the freedom to join, belong to or be a member of legal associations and be involved in their activities.

6.6

WE COMPETE FAIRLY

We treat our customers, competitors, suppliers and partners fairly. We do not seek competitive advantages by unlawful or unethical means. We never engage in anti-competitive activities, for example by agreeing on prices in advance, or get involved in situations where free competition is illegally prevented, limited or weakened.

We do not share Solita's confidential information with competitors nor do we accept our competitors' confidential information.

6.7

WE SAFEGUARD OUR PERSONNEL'S HEALTH, SAFETY AND WELL-BEING

As an employer, we promote physical and cultural activities and facilitate the work-life balance of our people. We are committed to promoting the health and safety of our personnel and others within our sphere of influence. We offer our personnel occupational health care that is more comprehensive than the basic level of service with a focus on occupational well-being and disease prevention. We also constantly invest in good working environments and premises and offer Solita employees for example recreational clubs where they can spend time with like-minded colleagues.

It is important that all our employees also have a healthy work-life balance. Everyone should have enough time to recover from work, spend time with their families and friends and do the things they enjoy. In case you notice your colleague suffering from an unbalanced workload, please inform their team lead or discuss with them directly to offer support - we do not want anybody to be left alone.

Working under the influence of alcohol, drugs or other illegal intoxicating substances is not accepted. Alcohol may sometimes be served at specific events (e.g. project celebrations) organised by Solita, but in a responsible manner. The use of any other illegal intoxicating substances is strictly forbidden.

Please keep in mind that you are Solita's representative when working outside of our workplace as well as during business trips. This requires appropriate and responsible behaviour in regard to alcohol and other substances, and making sure you are in a good working condition when working. Your customers and colleagues need your skills and concentration. We do not want you to risk your own or others' safety or well-being.

7

We take responsibility for the environment and sustainable development

We are committed to developing increasingly sustainable solutions together with our customers and digitalisation plays a key role in this. In our projects, we combine our customer's business development with comprehensive customer insight, digitalisation and analytics as well as change management. Our aim is always to act in a way that both our customer and we, as a company, can be proud of.

As a company, we use natural resources responsibly and actively develop our operations to make them more environmentally friendly. Expert work in offices is, by nature, more environmentally friendly than, for example, the manufacturing industry. Solita's environmental burden is mainly based on two things: business trips and the environmental impact of IT equipment. Below we have described the ways in which we aim to reduce the environmental impacts at Solita.

7.1

WE PREFER PUBLIC TRANSPORT WHEN TRAVELLING

Travel is part of our employees' work and many of us regularly travel either to another office or customer locations. Travel is a major expense for us and it also burdens the environment, but there are situations in which face-to-face interaction is by far the best and most effective way to work. These situations include, for example, kick-offs for new projects, retrospectives, workshops and the induction of new Solita employees.

If face-to-face interaction is not necessary due to the nature of a meeting, our aim is to organise it, for example, through a video conference. Whenever travelling is required, we prefer public transport and follow the applicable travel regulations. We encourage our employees to choose a train or other means of public transport instead of flying whenever it makes sense.

We encourage Solita personnel to use public transport by offering them an employer-subsidised commuter ticket as an employee benefit, if this is applicable locally. We also provide flexible remote work opportunities that can be utilised if accepted by the customer and project.

7.2

OUR OFFICE LOCATIONS AND PRACTICES HELP SAVE NATURAL RESOURCES

When selecting our office locations, we make sure that they can be easily reached by public transport. We pay attention to the scalability and adaptability of our workspaces when designing them. We recycle old IT equipment, batteries, glass, paper, ink cartridges and biodegradable waste in an appropriate manner. This allows us to save natural resources.

A woman with blonde hair tied back, wearing a black top and a floral patterned jacket, is smiling and looking towards the left. She is sitting at a desk with a computer keyboard and mouse. The background shows an office environment with other people and computer monitors. A large red semi-transparent shape covers the bottom half of the image, containing the number 8 and the main text.

8

**We build a better
society by developing
information work**

Solita is involved in building a better, increasingly digital society. We share our experiences and views through various forums. We are actively involved in collaborations with educational institutions.

Solita as employer

We offer work to over 1,000 people in Finland, Sweden, Denmark, Estonia, Germany and Belgium, including Solita employees and our partner network. Continuous learning is important for both the company and our highly skilled professionals. We invest a great deal in learning, for example by organising peer learning, training, knowledge community activities and events. We are proud of our casual, modern and encouraging workplace and corporate culture.

Blogs

We write several blogs related to digitalisation and specialist work, sharing information and Solita's views for the entire sector to use. By sharing our experiences and knowledge, we want to help develop our sector and people's working conditions and support continuous learning.

Networks and forums

Digitalisation and technological development are phenomena that concern all industries, people and companies. We have built Solita's own future-oriented Think Tank forums. We organise and sponsor events, seminars and meet-ups which offer an excellent way of sharing information between companies and different communities within the sector.

Open source solutions

If business-wise feasible, we share our solutions in an open source form to the world's developer community. Thus, our universal components can be utilised by people and companies all over the world. We share our freely available components through the GitHub service from where they spread to general use. We also often use open source solutions. <https://github.com/solita>

Collaboration with educational institutions

We hold visitor lectures, organise excursions and sponsor educational institutions. We offer part-time and flexible employment opportunities to graduates and students who are finishing their studies and we supervise final thesis projects.

Charity

Every year we take part in chosen charity campaigns and donate money to charity. Solita employees also usually have the opportunity to choose a charitable donation as their Christmas gift.

9 WE SPEAK UP

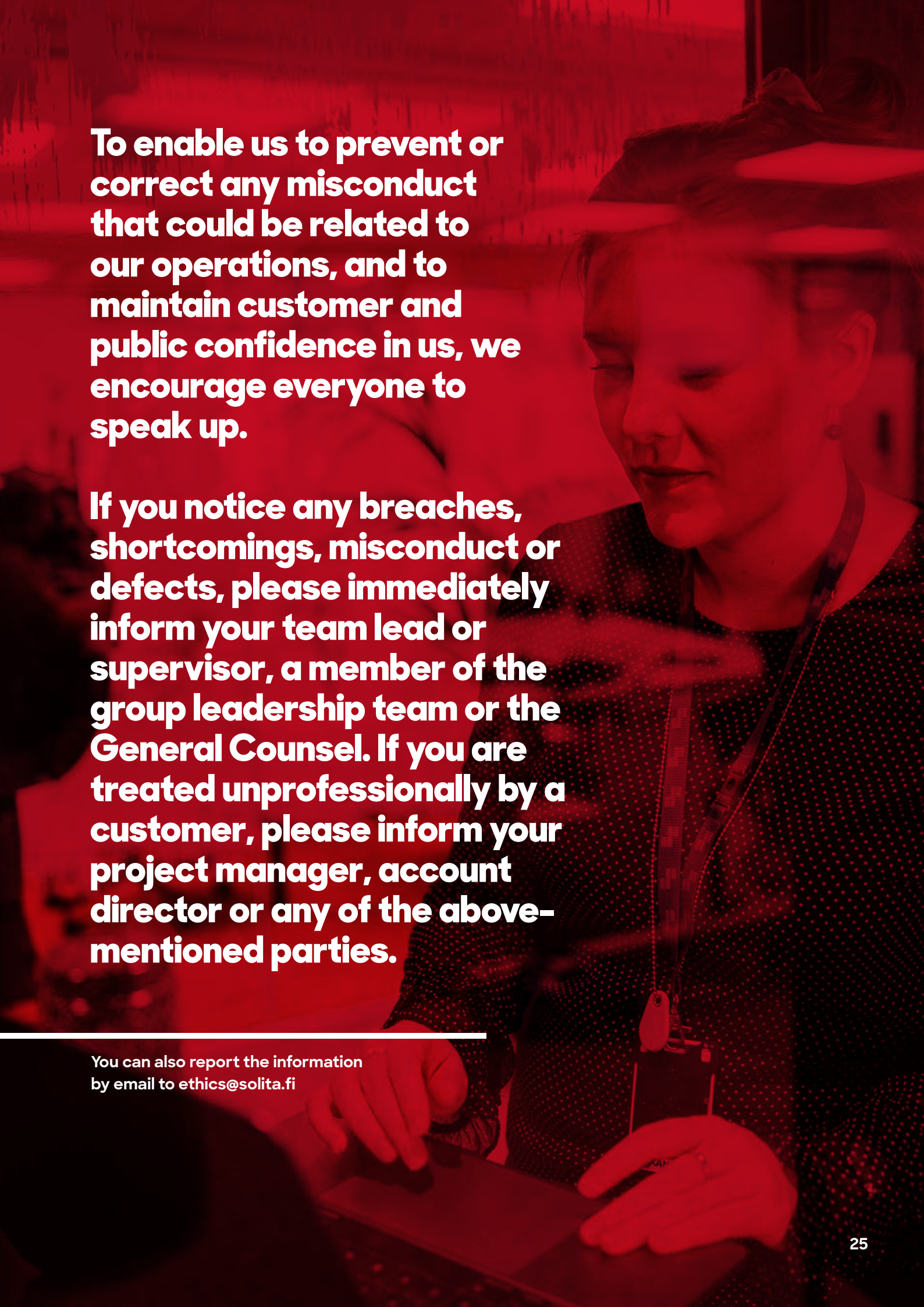
We all have the responsibility to speak up and address issues, if we notice any. This is also aligned with our core value: Caring.

Our reliability, reputation, brand and long-term success are based on ethically sustainable operations. Solita's principles of responsible operations are summed up in this Code of Conduct, which is intended for all employees of the Solita Group and its subsidiaries as well as partners acting on behalf of Solita.

If you feel that you are unable to share your information openly, you can do it anonymously via an anonymous reporting channel. To ensure anonymity, the reporting channel is managed by an external partner, WhistleB, Whistleblowing Centre.

THE ANONYMOUS REPORTING CHANNEL: [HTTPS://REPORT.WHISTLEB.COM/EN/SOLITA](https://report.whistleb.com/en/solita)

Suspected breaches are always investigated confidentially, and no disciplinary measures will be taken before completing the investigation. Should a violation of the Code of Conduct 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.



To enable us to prevent or correct any misconduct that could be related to our operations, and to maintain customer and public confidence in us, we encourage everyone to speak up.

If you notice any breaches, shortcomings, misconduct or defects, please immediately inform your team lead or supervisor, a member of the group leadership team or the General Counsel. If you are treated unprofessionally by a customer, please inform your project manager, account director or any of the above-mentioned parties.

You can also report the information
by email to ethics@solita.fi



**Solita is a community of highly
and widely skilled experts
geared for impact and
customer value.**

We do what matters to build the future with our clients by delivering high-quality solutions to real problems. Our unique service portfolio seamlessly combines expertise from strategic consulting to service design, software development, analytics and data science, cloud and integration services. Founded in 1996, Solita is a fast-growing community of over 1,000 professionals in Finland, Sweden, Denmark, Estonia, Belgium and Germany

solita.fi/en | [@SolitaOy](https://twitter.com/SolitaOy)