

Code of Ethics



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Partnera is a business group that creates shareholder value and a more sustainable future through its operations. Our companies produce services and products to meet the needs of society and respond with their operations to game-changing megatrends. We are an active majority owner and a partner to our companies in all stages of their lifecycle. As an impact investor, our goal is to use employ our capital for the development of business that promotes a positive impact in society and sustainable development goals.

At Partnera business group, we are committed to responsible and ethical conduct towards our employees, customers, partners and other stakeholders every day. Through ethically sustainable operations and decisions, we build the group's reputation as a trustworthy and responsible partner and employer.

Our mission statement, vision and values guide our operations

- Our mission is to be an active owner that strives to both create shareholder value and profit as well as promote sustainable development and bring a positive impact on our surrounding society.
- Our **vision** is to be a partner and impact investor that uses its assets to build a more sustainable society in industries undergoing transformation.
- Our **values** are value creation, responsibility, partnership and courage.

Purpose of the Code of Ethics

This Code of Ethics lists the principles of good business practices observed by the Group in its daily operations and decisions. The Code applies to all employees of the Group regardless of their duties or role. Actions that are contrary to the Code of Ethics may result in consequences. We also expect our partners to observe these principles.

In addition to this Code of Ethics, Partnera has issued principles and policies which the company and its employees must observe in their work. Companies belonging to Partnera business group may have more detailed ethical guidelines, principles and policies which the personnel of the company concerned are required to follow.

Reporting abuse or suspected abuse

All cases of abuse or suspected abuse should be reported without delay. Reports are handled confidentially and are submitted to a third party authorised by Partnera for investigation. Reports can be emailed to whistleblowing@partnera.fi.

Our ethical principles

We comply with laws and regulations

- We expect the Group's employees to comply with laws and regulations in all their activities.

We are a safe and equal workplace

- Partnera business group is a safe and equal workplace. We respect each other and treat our employees fairly and equally.
- We are committed to the principles of the International Declaration of Human Rights. We do not condone human rights violations.
- We do not condone any forms of discrimination or harassment. We treat our employees equally without discrimination based on race, ethnicity, nationality, gender or sexual orientation, political views, marital status, religious views or disability.
- We respect our Group's employees' freedom of association of and their right to organise.

Our business practices are fair and sustainable

- We develop business that helps promote a positive impact to society and further sustainable development goals. We take social, environmental and financial aspects into account in our decision-making. We are committed to increasing our company's shareholder value.
- We are an active owner and partner to our companies. Our goal is to develop the business and value of our companies over the long term.
- We work with honesty and in accordance with the interests and goals of Partnera business group every day. We avoid situations where our own interests conflict with those of Partnera or Group companies.
- We build healthy business relationships and follow good business practice. We treat our business partners professionally and fairly.
- We choose our partners carefully and require compliance with laws and regulations in their operations.
- We support free and fair competition. We comply with competition law designed to promote effective competition and protect the market from unfair business practices.
- We do not condone bribery or corruption in any form. We do not give or receive direct or indirect bribes or benefits that could be considered bribes or corruption.

We handle our property and data with care

- We take care of our Group's assets and protect our business secrets. We do not participate in activities that could damage the reputation of Partnera or its companies.
 - We process confidential data carefully and only share it with persons with a right to access the data and need it for their duties.
 - We respect privacy protection and process personal data in accordance with the law.
 - We do not make use of inside information. We expect the Group's personnel to have read the Guidelines for Insiders.
 - As a publicly listed company, we comply with EU regulations in all our communications, including the Market Abuse Regulation ("MAR"), Finnish law, the Nasdaq First North Growth
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Market Rulebook of Nasdaq Helsinki Ltd, regulations by the European Securities and Markets Authority and the Finnish Financial Supervisory Authority, and the company's Principles of Corporate Governance and other internal guidelines.

- We communicate consistently, accurately, transparently, honestly, actively and fairly with our stakeholders. In our communications, we observe the Disclosure Policy approved by Partnera's Board of Directors.
- Partnera business group is a politically unaffiliated company and does not support political activities financially or otherwise. The use of our company's facilities or resources for the promotion of political activities is prohibited.

This Code of Ethics has been approved by Partnera Corporation's Board of Directors on 19 October 2020.
