



**EAB Group Plc's  
SUPPLIER CODE OF CONDUCT**

19.06.2021

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Responsibility is at the core of EAB Group Plc's and its subsidiaries' ("EAB Group", or "we") operations, values and strategy. Our values: responsible, accommodating, dedicated and open. As a listed company operating in the financial sector, we are bound by national and international regulation, and our activities are monitored by the Financial Supervisory Authority. As a responsible trailblazer in our industry, we have also voluntarily committed to practices that are sustainable from the perspectives of the environment, society and governance. These commitments include the Carbon Disclosure Project (CDP), Finsif and the Principles for Responsible Investment (PRI), created in cooperation with the UN.

We expect responsible operating principles from both our own employees and partners. This document described key sub-areas of responsible business and the code of conduct related to them, which we have committed to and which we expect all our partners to commit to in their operations. The prerequisites set for our partners' operations also apply to their eventual subcontractors.

Acting against the code of conduct can lead to the termination of cooperation between EAB Group and the partner in question. In addition, this type of action can lead to contract law sanctions, such as liquidated damages or damages depending on conditions set in the contract between EAB Group and the partner in question.



### HONESTY, OPENNESS AND COMPLIANCE WITH THE LAW

#### **Compliance with the law in all operations**

We and our partners must follow applicable national and international regulations, lower-level legislation and instructions from authorities.

#### **Governance**

In addition to the minimum obligations set by legislation, such as the Limited Liability Companies Act (624/2006), we are committed to following the Corporate Governance Code. We also require that our partners follow good corporate governance practices as appropriate for them.

#### **Whistle-blowing**

If a representative of our partners suspects or witnesses activities that breach this code of conduct, they must report them to our contact person. Our staff is committed to reporting all breaches of this code of conduct observed through EAB Group's anonymous whistle blowing system.



### FAIRNESS AND ETHICS

#### **Preventing the grey economy and corruption**

We or our partners may never promise or pay bribes or encourage anyone to take or give bribes. Other unlawful or unethical practices, such as extortion, money laundering and corruption, or encouraging someone to participate in them, are also forbidden in all operations.

**Fair competition**

We or our partners shall not participate in activities that limit or prevent fair competition. We require that our employees and partners follow competition regulation and are familiar with the competitive law codes of conduct essential for their operations.

**Related party transactions**

We and our partners ensure that when doing business with a related party, eventual conflicts of interest are considered in decision-making as appropriate, and decisions are made on a market basis and on regular commercial terms.

**Gift policy**

EAB Group has policies on the giving and receiving of gifts and representation. An employee of the company or member of the company's management must not accept or give any gifts or benefits that are or could be inconsistent with the best interests of the company or its customers, or otherwise provide any undue advantage to the person receiving or giving the gift, or to any third party. Our partners must not give or accept any gifts or benefits mentioned above from EAB Group's employees or members of the company's management.

**HUMAN RIGHTS AND TREATMENT OF EMPLOYEES****Respecting human rights**

We respect and promote internationally recognised human rights in all our operations, and require that our partners also do so. Our partners must ensure that they do not participate in human rights infringements. EAB Group and its partners must support, in their own activities, the efficient eradication of all kinds of forced labour and child labour.

**Prevention of workforce exploitation and discrimination**

All employees must be treated equally and with respect to the individual's value, regardless of gender, age, religion, health status or similar factors. Discrimination and harassment are strictly forbidden. EAB Group and its partner must support, with their own actions, the eradication of discrimination that occurs in the employment market and business.

**Equality**

EAB Group has prepared an equality plan, including actions to promote equality and equitable treatment, and agreements on how to monitor these actions. Our Board of Directors and management team include representatives of both sexes, and all our employees are offered equal career development and advancement opportunities.

We also require that our partners implement actions to promote equality and equitable treatment, and offer equal career development and advancement opportunities to all employees.

**Combining work, family and free time**

We think that it is essential for the entire company culture to support and enable combining work, family life and free time. Our employees are able to utilise all lawful family leave periods, and agree on part-time work, for example, according to their own family situation. Combining work, family and free time must not be an obstacle to a person's career development or advancement opportunities. Our partners must also implement actions to support their employees in combining work, family life and free time.

**Occupational safety, working time law and statutory payments**

All employees of EAB Group and its partners must be offered safe working conditions and sufficient insurance coverage, occupational healthcare, as well as pension insurance and other payments required by law. Ensuring safe working conditions means, in addition to the safety of working premises, that the workload of employees must be on an acceptable and sustainable level, for example. EAB Group follows the working time law in its operations, and we expect that also our partners do so. Overtime must be compensated according to the working time law, and where applicable, collective agreement.

**Remunerations**

EAB Group follows the special regulations concerning the financing sector in remunerations. The goal with remuneration is to support the achievement of the Group's strategic goals, as well as long-term growth and financial success, and to commit the employees to acting in accordance with the Group's goals. The remuneration systems have been created to function side by side with and contribute to effective risk management. We require that the remuneration policies implemented by our partners are compliant to regulations.

**Freedom of association**

EAB Group and its partners must support freedom of association and the efficient recognition of the right to collective bargaining. Employees must have the right to associate and elect their own trustee and occupational safety representative according to applicable labour law regulations.

**ENVIRONMENTAL PROTECTION****Environmentally friendly solutions and technologies**

The environmental efficiency of buildings owned by EAB Group's funds is improved by implementing environmentally friendly solutions in construction, development projects and maintenance. We require that our partners monitor the energy use of their buildings, and invest in environmentally friendly energy sources according to their possibilities.

**Decreasing environmental effects**

EAB Group's own operations do not cause any significant direct environmental effects, and the company mainly uses energy at its offices. EAB Group's key environmental effects are generated indirectly through its investment operations. However, we are aware that we can promote positive environmental effects by reducing the amount of paper we use, developing digital services, reducing air travel and energy consumption, and procuring low emission electricity, for example.

We also require that our partners consider environmental effects in all their operations and decision-making. Negative environmental effects of operations must be identified and managed.

**INFORMATION SECURITY AND TRUST****Keeping business secrets confidential**

Partners must keep the confidential information they obtain secret. This information must not be disclosed or handed to anyone other than the involved parties and authorities. EAB Group and its every employee are bound by bank and insurance secrecy.

**Ensuring the confidentiality of personal information**

In its operations and when processing personal data, EAB Group pays special attention to data protection and the privacy protection of its customers. We process the personal data of customers in compliance with the General Data Protection Regulation, legislation on investment services, auxiliary services, and insurance mediation and special legislation, and ensure that privacy protection and confidentiality obligations are followed when processing personal data.

We also require that our partners follow the data protection regulations applicable to them, such as the EU General Data Protection Regulation, as well as good management of personal information and data protection policies. Only personal information that is absolutely necessary may be collected and registered.