



Code of Conduct

Table of contents

1	Introduction	3
2	Culture	3
2.1	Sustainability as a frame of mind	3
2.2	Openness & transparency as a cornerstone of our culture	3
2.3	A sustainable pace enables well-being and productivity in the long run	4
2.4	Professional growth as a distinctive value	4
2.5	Unique individuals are our strength	4
3	Community	5
3.1	Positive influence through sustainable digital development	5
3.2	Services by people, for people	5
3.3	Engaging and supporting communities	5
4	Conduct	6
4.1	Responsible business is our core	6
4.2	Leadership means taking accountability	6
4.3	Commitment to social safety	7
4.4	Dedication to planetary well-being	7
4.5	Addressing the ethical challenges arising from tech	8
4.6	Uncompromised security, privacy, and data protection	8
4.7	Respecting human rights	8
4.8	Promoting ethical behaviour	8
4.9	Working with our partners and subcontractors	9
4.10	Speaking up and whistleblowing	9

1 Introduction

We believe the future is what you make it. We assist businesses in adopting sustainable digital development and establishing enduring digital strategies committed to ethical sustainability that considers the environment, society, and the economy.

We pursue our vision through our company values: Passion, Unity, Pragmatism, Agility, and Efficiency & Effectiveness. Our values define who we are as a company and our expectations. Our Code of Conduct sets the foundation for all our actions with our people, our customers, as well as our partners and other stakeholders. We use it to make sound, ethical, and sustainable decisions which apply to everyone in Nitor, regardless of their position or location.

2 Culture

2.1 Sustainability as a frame of mind

As a company committed to sustainable digital development, we operate responsibly and strive for a positive net impact on our clients in sustainable digital business. While we generate a positive impact through digital development, we also recognise our adverse effect on the environment. We encourage our employees to promote a more sustainable lifestyle.

We have aligned our business according to the United Nations Global Compact's Ten Principles and the Sustainable Development Goals, and we further refine this alignment with detailed policies and guidelines that steer our operations more precisely.

2.2 Openness & transparency as a cornerstone of our culture

Our commitment to openness and transparency is fundamental to our culture and operational approach. We actively cultivate an environment that encourages curiosity and welcomes questions, fostering a collaborative atmosphere through open information sharing. We maintain an open-door policy for all internal organisational meetings to ensure inclusivity and collective insight.

2.3 A sustainable pace enables well-being and productivity in the long run

At Nitor, we foster a long-term vision for our employees by advocating a sustainable and manageable work pace: A culture of work-life balance, a culture of growth, a culture of support, and a culture of responsibility is actualised through our principles of sustainable pace.

We promote work methods that bolster our employees' well-being and ensure long-term productivity. We support our people through extensive physical and mental health programs.

2.4 Professional growth as a distinctive value

Knowledge and skills are the fundamental values we bring to our customers. We offer all our employees equal opportunities to further education and to advance their careers according to their interests.

While we recognise that most learning happens during daily work by experimenting and facing new challenges, we actively promote social and shared learning and knowledge sharing with programs like internal competence development projects and mentoring. To help utilise the learning possibilities, we provide support, a set number of days, and a portion of work time for personalised competence development.

2.5 Unique individuals are our strength

Unique personalities are our strength, and we do not believe in hiding our true selves at work. We seek people who share Nitor's values and consulting mindset -regardless of background. Nitor is committed to ensuring that everyone has access to the same opportunities. We strive to give underrepresented groups equal chances to thrive and succeed at Nitor.

Nitor is committed to providing everyone with a safe and healthy working environment. We treat people respectfully and promote psychological safety in all our encounters. We ensure that everyone is heard and has the opportunity to express their opinions.

3 Community

3.1 Positive influence through sustainable digital development

We create business-critical systems that adapt to evolving customer and market needs by transforming methodologies, design and technology. We focus on digital inclusiveness and ethics to contribute to a sustainable economy and environment.

We, seasoned Digital Engineers, help our customers discover and deliver measurable outcomes that serve their customers and turn into business value. We create business impact by building solutions with empowered teams who drive positive change in their environment. We prioritise our customers' success and our teams' well-being and aim to make digital development sustainable.

3.2 Services by people, for people

The quality and safety of our services are priorities at Nitor. We believe in creating digital success stories together with our customers. We don't code for machines; our work comes to life with people using the services we have built with our customers. Our sustainable approach to digital design considers changing needs, ways of working and new technologies and innovations.

We are adamant about responsible technology that considers regulation, cybersecurity, the environment, and the best practices of the IT sector. Furthermore, we consider unintended consequences and negative impacts our work may enable or have.

3.3 Engaging and supporting communities

We openly share the experience and expertise we have gathered, aiming to accelerate the progression of sustainable digital development and build an ecosystem around it. Promoting sustainable digital development and enhancing the competitiveness of businesses is more important than clinging to traditional business models by protecting specialised expertise and invoking trade secrets.

Participating in the activities of the professional community promotes sustainable digital development by taking care of the methodological and technical expertise of domestic professionals in global competition. In addition to the expertise perspective, the objective is to raise and support the software industry's attractiveness among women and promote equality in the field.

We sponsor the activities of student associations through annual sponsorships, advertising on guild overalls, and contributing to the costs of annual celebrations.

4 Conduct

4.1 Responsible business is our core

Long-term partnerships are the core of our business, and customer satisfaction is vital. Economic responsibility consists of profitable, stable business growth and a responsible partner network.

We comply with the laws, regulations, and other government guidelines that apply to our operations. Our commitment to legal compliance transcends mere adherence to laws and regulations. Our deep understanding and proactive management of industry-specific legal requirements ensure our operations' integrity and legality and affirm our status as a responsible and trustworthy partner. When needed, we cooperate with our customers' legal experts to understand their legal position and policies.

We are committed to fair competition and respect and protect intellectual property rights. We ensure compliance with laws and regulations to prevent market-damaging practices. We adhere to laws governing copyrights, patents, trademarks, and trade secrets, recognising their crucial role in fostering innovation in the digital sector.

We comply with all pertinent financial regulations, encompassing taxation, financial reporting, and anti-money laundering practices, to maintain transparency, accountability, and the overall economic viability of our operations.

4.2 Leadership means taking accountability

At Nitor, responsible leadership means taking accountability for leading ourselves. We offer our employees different possibilities, tools, and services to support that. For example, employee representatives are a part of the steering team. We allow all employees to participate in decision-making and various opportunities to engage in our strategy and company development.

Our board and leadership team are responsible for keeping Nitor updated on external obligations and making decisions on the direction. We collaborate through dialogue, transparency, and humbleness.

4.3 Commitment to social safety

We are committed to fair and equal treatment of our employees, partners, customers, and anyone seeking employment at Nitor. We do not discriminate based on age, origin, citizenship, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation, or other reasons related to the person. We also do not tolerate bullying or harassment of any kind, including sexual harassment, racism, or any type of violence or abuse.

We are committed to promoting diversity, equity, inclusion, and belonging in every aspect of our work, from our recruitment process to everyday job environments and internal events. To guide our efforts, we have developed a set of core statements that serve as a foundation for our DEIB initiatives and help us ensure that our community remains a safe, welcoming, warm, and supportive environment for everyone.

Nitor has safer space principles that all company interactions, communications, and events must follow. A safe space is a supportive, non-threatening environment where all participants can feel comfortable expressing themselves and sharing their thoughts without fear of discrimination or retaliation.

4.4 Dedication to planetary well-being

We are committed to transparently reporting our sustainability efforts and progress, encompassing environmental, social, and governance (ESG) aspects, by regularly publishing detailed reports outlining our initiatives, achievements, and improvement areas. By doing so, we aim to maintain accountability, foster stakeholder trust, and demonstrate our ongoing dedication to positively impacting all areas of our business operations.

We have environmental management system certification across all our offices to minimise our organisation's environmental impact and optimise the use of natural resources in all operational fields. We set annual goals, track progress through regular reports, and continuously strive for improvement.

We demonstrate our commitment to environmental sustainability by defining a comprehensive plan to reduce our emissions in line with the Science Based Targets initiative. We measure our carbon emissions annually according to GHG protocol and offset any unavoidable emissions from our operations.

We adhere to applicable environmental laws and regulations as part of our dedication to environmental sustainability. This commitment extends to waste management, emissions control, and adopting environmentally friendly technologies and practices. We conduct our business in an environmentally responsible and legally compliant manner, promoting sustainability and aligning with relevant environmental laws and regulations.

4.5 Addressing the ethical challenges arising from tech

We are committed to the highest standards of ethics in technology. Our approach to ethics in tech ensures responsible data sourcing, adherence to privacy laws, and AI's ethical development and deployment, prioritising transparency, explainability, trustworthiness, fairness, accountability, human oversight and respect for human rights.

4.6 Uncompromised security, privacy, and data protection

We take care of the data, intellectual property rights, materials, and hardware trusted in our possession, regardless of who owns it. Given our digital focus, compliance with data protection and privacy laws is crucial to ensuring the privacy and security of user and client data. We've set up clear processes for handling confidential and personal information and data security. We also regularly train our employees on security awareness.

4.7 Respecting human rights

We adhere to all relevant employment laws, covering workers' rights, equal opportunity, non-discrimination, and workplace safety, and uphold internationally recognised human and labour rights, including the UN Universal Declaration of Human Rights, the UN Global Compact Principles, and the ILO Core Labour Standards, to ensure a fair, safe, and equitable working environment, while strictly prohibiting any form of forced, compulsory, or child labour in all our operations.

We respect our employees' right to organise, join associations and trade unions, and bargain collectively with the company. Where appropriate, we seek to promote other forms of employee representation.

4.8 Promoting ethical behaviour

We recognise that corruption manifests itself mainly as unethical actions rather than breaking the law in our context. Thus, remain vigilant in situations and decisions where, for example, favouritism may play a role.

We pay attention to situations where one can gain or is at risk of giving the impression of gaining unfair personal benefits at the cost of Nitor or our professional obligations. We focus on transparency, honesty, and high integrity when we operate with governments and government officials. We are dedicated to preventing corruption and conflicts of interest in all aspects of our operations.

Offering or accepting gifts and hospitality is done openly and without promises or expectations of reciprocity. The gifts and hospitality are reasonably priced, appropriate to the business relationship, related to a legitimate business purpose, and follow laws. We comply fully with all applicable anti-money laundering and counterterrorism financing laws and will only accept funds from legitimate sources.

Nitor does not use its funds, resources, or facilities to support political parties or candidates. We make any donations for charitable purposes or sponsorship activities voluntarily. They must be appropriate, adequately approved and in line with our values.

4.9 Working with our partners and subcontractors

We extend our commitment to ethical practices and responsibility beyond our boundaries. In line with our code of conduct, we ensure that our partners and subcontractors adhere to similar principles, encompassing ethical sourcing, responsible practices, and respect for human rights.

4.10 Speaking up and whistleblowing

In line with our open and transparent culture, various confidential and anonymous channels are available for employees and stakeholders to raise concerns about possible misconduct. These channels can be utilised to report suspicions of unethical and inappropriate conduct.

Nitor welcomes all reports and is committed to protecting the rights and identities of those who speak up in good faith and those subject to a report. Retaliation against persons who raise concerns in good faith is not tolerated.

Employees are encouraged to discuss concerns with Nitor's Leadership or People Operations. Reporting through anonymous channels is also available if something other than these options seems suitable.

Operated by an external service provider, our whistleblowing channel processes reports through the company's internal representatives. Ensuring the utmost confidentiality in the process is a priority for us. The whistleblowing channel, available in English, Finnish, and Swedish, is open to all and can be accessed at www.firstwhistle.fi/nitor