

CODE OF CONDUCT

1 Introduction

Startecon Oy together with all its affiliates ("**Startecon**") commits to be a reliable employer and business partner and thus requires all members of the organization to adhere to the standards set by this Code of Conduct. We commit to conduct our business ethically, responsibly and in compliance with applicable laws, standards and regulations. Startecon requires actions set in this Code of Conduct from all its suppliers, subcontractors, and partners ("**Partners**") and expects the same level of compliance and commitment.

2 Conflict of interest

All employees and directors ("**Employees**") must recognize possible sources of conflicts of interest and take appropriate actions to avoid such conflicts and situations that may be deemed as conflicting by third parties. The person concerned must report potential conflicts of interest appropriately as soon as they arise.

Due diligence processes are applied if deemed necessary to mitigate the possibility of conflicts of interest and support informed decision-making.

3 Human rights

Startecon complies with the following principles:

- Universal Declaration of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Principles on human rights and companies

These principles outline Human rights of all workers, interns, governance body and personnel in vulnerable positions. We strive to support equality, work-life balance, and help people in less privileged positions. Volunteer work is at heart of our operations to support more sustainable future.

4 Sustainability

Staratecon's framework for its environmental, social and economic sustainability targets is the United Nations' Sustainable Development Goals (SDGs). We commit to report our sustainability data yearly to better the contingency and transparency of our sustainability.

5 Environment

Our environmental policy ensures that important environmental impacts are considered in our daily functions, projects and further development. Our environmental policy principles focus on resource efficiency and circularity to support Green ICT and effective material reuse.

6 Anti-corruption and anti-trust

Staratecon condemns all forms of corruption, including bribery and unlawful restriction of fair competition. Transparency and fairness in business practices are key, especially when co-operating with government officials. Conformity with anti-trust laws is enforced.

Employees shall withhold from conducting any acts affecting competition that would be deemed to be unethical.

7 Confidentiality and data processing

Confidentiality and lawful processing of personal data must be respected. Confidential information shall be handled with care and vigilance, especially information regarding Staratecon's customers and business partners. Access to all confidential information must be limited.

Staratecon complies with GDPR laws in entirety of all its functions and actions. Additional confidentiality and data processing laws are enforced if necessary.

8 Responsible AI use

We are dedicated to minimizing unsustainable AI use. The procedures to decrease unnecessary AI use include, for example streamlining processes, making more simplified AI use and using AI only when it's necessary.

9 Fair labour and wages

Startecon acts in accordance with treaties composed by the International Labor Organization and does not utilize child labour nor forced labour. We respect our Employees' rights of association. Startecon commits to collective bargaining agreements for the basis of employment contracts to ensure fair and lawful terms and conditions for employees. Each contract is drafted with care and according to Finnish employment laws to ensure work safety and wage requirements to the role.

10 Health and safety, training

The health and safety of our Employees is a priority. We provide our Employees with safe working conditions and sufficient training to conduct their work with minimal hazard. Employee health is supported through promoting healthy living habits and offering occupational health care. We value lifelong learning and education and encourage our Employees' active participation to various courses and training programs.

We recognize Employee wellbeing and mental health as part of health and safety, and we strive to commit to principles of safer space. To support our Employees', we commit to efforts towards strengthened team spirit, positive Employee relationships and possible flexibility to accommodate work-life balance.

Startecon has strict policy for hybrid work. For occupational health and productivity purposes, majority of work is done on-site. Hybrid work is used to reduce business travel e.g. to reduce air travel for short visits.

11 Young workers and interns

We recognise the vulnerable position of Startecon's under 18 years old workers and interns ("**young workers**") and strive to guide and inform these Employees of their rights, responsibilities, and workplace safety. We are committed to creating safe, respectful, and supportive environment where learning, professional development, and guidance are promoted. Appropriate supervision and guidance are provided to protect young workers from discrimination, exploitation, and excessive workloads to ensure compliance to applicable laws regarding the employment of young workers.

The level of skills is assessed during interview process. Aim and target of an internship is reviewed to have mutual understanding of projects and role description of specified internship period.

12 Respectful workplace

An accepting and welcoming work environment is essential for the well-being of our Employees. Startecon offers each Employee equal opportunity to succeed and advance in their career regardless of gender, nationality, religion, race, age, disability, sexual orientation, political opinion, union membership, or social or ethnic origin. Employees are expected to act according to non-discrimination policies both within and outside the workplace.

Startecon has a zero-tolerance policy regarding harassment and abuse. Employees are encouraged to report any disruptive behavior should they become aware of it.

13 Trafficking

We do not accept human trafficking in any form. Other trafficking, such as but not limited to, firearms and their parts, components, ammunition, or smuggling of migrants are outright against our values, and we condemn all actions which promote or enable trafficking. We prohibit modern slavery practices in our supply chains and partners.

Anyone who becomes aware of actual or suspected human trafficking should inform a trustworthy authority. Reports made in good faith will never result in retaliation.

We take identifying, preventing, and addressing human rights risks seriously within Startecon and partners in our supply chains.

14 Accountability

Startecon does not accept deviations from the Code of Conduct. Employees who do not follow the Code of Conduct must be held accountable by appropriate authority. Avenues for reporting violations are upheld.

All Employees must accept this Code of Conduct before starting or continuing work at Startecon. If new Code of Conduct replaces this version, new version should be accepted before continuing work.