



SAVOX

Code of conduct (EN)

Savox ethical operating instructions

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PREFACE

Why is this kind of document needed?

The Code of Conduct gives us common rules on how we operate at Savox. When we act by legislation, Code of Conduct, Savox values, and Savox's other guidelines and handbooks, our daily work will likely be easier and on an ethically sound basis.

We need a variety of policies to build and maintain lasting employee, customer, and cooperation relationships both in Finland and abroad. Especially in international cooperation, it is easier for us to ensure that all parties are committed to the same, ethically sustainable principles.

Our operations are guided by trust and honesty. Our guidelines and values guide us to the right kind of action.

With this Code of Conduct, we clearly express our values, why they are important, and what kind of norms and practical rules we work with.

Everyone at Savox has the responsibility for following the Code of Conduct!



Managing Director, Espoossa 1.2.2023



SAVOX'S VALUES

Our values are the focus of our operations:



Trust

Trust is the basis for everything we do. It is the prerequisite for our success. Our strong expertise leads the way.



Collaboration

We work as a team to utilize each other's strengths, diverse skills, and experiences. We listen and evolve together and contribute to our common goals.



Innovation

We drive innovations for new technologies and encourage experimentation to provide our customers with the best possible communication solutions.



Perseverance

We find and provide you with a solution with determination and confidence. Whatever the conditions, failure is not an option.

GUIDING PRINCIPLES AND RESPONSIBILITIES/OBLIGATIONS OF DIFFERENT PERSONNEL GROUPS

- 1 **We comply with the laws of our operating countries and Savox's policies and practices.**
- 2 **We always act honestly and fairly. In this way, we set an example for others.**
- 3 **We promote honest company culture.**
- 4 **We make sure that our Code of Conduct is followed.**

Our duty

We orientate each of our employees with our Code of Conduct. However, the Code of Conduct does not provide an answer to all future problem situations; you cannot prepare for every problem you may encounter when drawing up guidelines. However, the guidelines will guide us in the right direction.



If the situation is difficult, do not make the decision alone. Contact your supervisor or Savox management. You will always get help.

Here's what each of us does:

- Learn this Code of Conduct, follow the policies in it, and ask for help if needed
- If you notice any activity that does not comply with the Code of Conduct, report it to your supervisor or Savox management. You can also use Savox's notification channel
- Avoid activities that appear to be illegal, inappropriate, or may damage Savox's reputation
- If you are notified of suspicious activity, support the whistleblower, and take the matter seriously. Inform the whistleblower about the possibility of forwarding the matter

Responsibilities of management and supervisors:

- It is the task of the management and supervisors to monitor compliance with the instructions in their own function/organization and to ensure that the activities in their team are honest
- The task of the management/supervisors is to promote the activities by the instructions in every way
- The task of the management/supervisors is to encourage openness and alerting of miss-conduct and to remind employees of Savox's reporting channel

Separately, the task of the management is:

- Identify potential risks related to the operation of teams and try to minimize them in advance and take care of the necessary training for the teams
- Regularly remind their teams of the importance of following the guidelines and act as an example
- It is also the responsibility of the management to ensure the training of all personnel

Make responsible (ethical) decision

If you must make decisions in a situation where you may raise questions about ethics or compliance, think about it:

Do you have enough information?

- If necessary, discuss the matter with your supervisor, colleagues, or persons who may know the matter and circumstances to be decided

Is the decision legal?

- If it appears that the proposed decision is not legal, do not make a decision
- We always comply with the laws of each country of operation

Is the decision contrary to our values and policies?

- If it seems that the decision does not correspond to our values or practices, do not make the decision, but reassess the matter
- If you don't think a decision is the right one, it's likely to be against our values and practices

Also, think about the decision from the point of view of how it looks in public. If you find that the decision does not look good, don't make it.

CONFLICTS OF INTEREST

Make sure that your activities, both at work and in your free time, do not conflict with those of Savox. You need to have written permission from Savox if you have a legal relationship with another company.

Do not make work-related decisions involving a person or relative close to you or from which You or your family may benefit.

Do not recruit family members or friends. Also, do not act as a supervisor for a family member or friend.

Use Savox's assets primarily to support Savox's business.

Do not act as an employee or manager of a charitable or non-governmental organization that can receive support from Savox.

When can a conflict of interest arise?

- When personal interests make it difficult to carry out your work duties impartially
- A situation that appears to be a conflict of interest alone can damage reputation and trust. Avoid situations where your actions may appear to the outside world as if there is a conflict of interest

FAIR COMPETITION

We compete in a tight market, but we do it fairly. In many countries, competition is regulated by competition laws. They prohibit agreements restricting competition and arrangements between competitors.

Savox complies with competition laws; fair competition is part of Savox's way of working. Informal discussions alone can be considered a restriction of competition, even if nothing is written into the agreement.

When communicating with our competitors, use clear and unambiguous language so that You are not misunderstood. Do not speculate on the possible legality of the actions. When meeting with competitors, be careful not to share confidential or sensitive information in the conversation.

CORRUPTION



If we give a gift, its value can be up to €50. We also don't accept gifts over €50.

Savox does not accept the offer of bribes to customers, authorities, or third parties. It is also forbidden to accept bribes. Inappropriate gifts, entertainment, and commissions are considered bribery; in some cases, donations are as well. In many cases, the value of the gift makes the gift bribery.

When offering gifts or showing hospitality to the authorities, you must be vigilant and comply with the destination country's legislation. What constitutes normal hospitality in business-to-business activities may constitute bribery on the part of the authorities. The previously mentioned gift of €50 can be considered bribery. In all activities with the authorities, be careful that your actions do not appear to be an attempt to influence the activities and decision-making of the authority. Ordinary influencing is acceptable and normal practice.

Be careful with the serving of alcohol. A glass or two of wine served with a meal is ok, but you should otherwise refrain from serving alcohol.

We are committed to complying with all applicable accounting and reporting requirements. We comply with anti-money laundering laws. We only work with companies whose funds come from legitimate sources.

We do not grant unreasonable requests for travel, accommodation, or hospitality, whether by the authorities or our customers, or their close relatives or friends. Similarly, we refuse donations to charities or organizations that are affiliated with our stakeholders. In addition, we do not pay a fee for processing our case in an expedited manner, for example at customs.

Also, don't accept an invoice that appears inappropriate or too large when processing purchase invoices.

If you come across a situation that may constitute bribery, please contact your supervisor or Savox's management. You can also use Savox's notification channel.

INTERNATIONAL TRADE

Savox complies with Finnish, destination, and international trade laws and regulations in its trading. We report on our trading as required. We expect the same from our trading partners and suppliers.

COOPERATION WITH THIRD PARTIES

By third parties, we mean the companies and individuals we use as our subcontractors, as well as our suppliers and their personnel.

We want our relations with third parties to be transparent and to operate on an ethically strong basis. Savox defines the eligibility criteria that third parties must meet; they must act by the laws of their country and meet the values of this guideline.

Savox chooses its partners. For example, pressure from our client cannot be an argument for choosing a partner.

Make sure that there are no conflicts of interest when choosing a partner, for example, that your family member or another person close to you plays a significant role in choosing a partner.

In challenging situations, contact your supervisor.

WE TAKE CARE OF THE ENVIRONMENT

We are committed to taking care of our environment. We comply with the law and our environmental policies. In our operations, we strive to reduce the harm caused to nature by our operations, for example, by paying attention to the amount of waste generated.

We require our customers and other partners to act at least by the environmental laws of their respective countries.

SAVOX RESPECTS ITS EMPLOYEES

Equality, non-discrimination, and respect for each other are the starting points of Savox's corporate culture. We value all our employees, regardless of their location. Every employee has equal opportunities to succeed at work. Each of our locations is valuable to us.

We do not tolerate any form of discrimination, harassment, or retaliation. We have zero tolerance for any kind of bullying.

Recruitment decisions are made regardless of gender, race, religion, colour, nationality, ethnicity, nationality, age, disability, sexual orientation, gender identity, sexual characteristics or expression of sexuality, marital status, trade union membership or lack thereof, or other personal characteristics protected by law. No one shall be discriminated against based on these characteristics.

In all our locations, we want our employees, partners, and our customers' employees to feel that their work environment is safe, where no one is bullied, threatened, or harassed, sexually or otherwise.

We communicate both inside Savox and externally professionally and with respect for people.

We follow these principles even if the applicable legislation does not specifically prohibit it.

HEALTH, SAFETY, AND WORKING ENVIRONMENT

We want to ensure that every employee can experience their work and work environment as healthy and safe. We follow safety instructions and processes at work. We also require it from our subcontractors and other partners.

If you notice a dangerous situation at work, notify your supervisor and, if necessary, interrupt the work.

In addition to following safety guidelines at the workplace, we require that our commutes are safe. We wear seat belts when driving a car and follow traffic rules. When attending teleconferences while driving, we use hands-free devices.

WE TAKE CARE OF HUMAN RIGHTS FOR OUR PART

We strive to ensure that all materials used in our products come from socially reliable sources. We do not tolerate and do not participate in violations of human rights.

Under no circumstances does Savox condone the use of slave, child, or forced labor or human trafficking in its operations or any part of the global supply chain.

PRIVACY POLICY

Savox respects the right to privacy. We collect, use, store, and otherwise process personal and customer data responsibly, carefully, and in compliance with applicable laws.

We process, store, and disclose personal data only if there is a legitimate business reason for doing so. We always follow best practices and procedures when processing personal data.

OUR ACCOUNTING

Savox complies with current laws and regulations concerning the company's accounting and reporting to the authorities.

REPORTING MISS-CONDUCT

Acting against the Code of Conduct may harm Savox and may weaken the trust of our customers, partners, and employees in the company. If you notice any activity that does not comply with the instructions, report it immediately to your supervisor or Savox management. If you want to report anonymously, use Savox's reporting channel.

Savox's corporate culture encourages its employees to share their concerns and actions that violate the Code of Conduct. Savox does not tolerate any kind of negative consequences towards a person who tells about his doubts. Any form of retaliation is prohibited.

SAVOX NOTIFICATION CHANNEL

Savox introduces a notification channel. The reporting channel is (most likely) based on a law that will enter into force in December 2023, according to which an organization with more than 50 employees and less than 250 employees must have a channel and a place where an employee can anonymously report misconduct and suspicions. The introduction of this channel will be announced later.



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