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# Code of Conduct

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# Purpose and Scope

Aspia Group’s (“Aspia”) culture is built on relationships and trust. Therefore, it is important for us not only to comply with the laws and regulations in the countries where we operate but also to maintain a high ethical standard. We have high ambitions, and our Code of Conduct describes the expectations we have for ourselves, our employees, and our business partners.

The Code of Conduct is a guide for all Aspia employees, helping us act responsibly and ethically to foster long-lasting relationships with customers, colleagues, suppliers, and other stakeholders. It serves as a daily tool for both internal operations and external interactions. We expect not only our employees but also suppliers, business partners, and others we collaborate with to adhere to these principles.

Every employee and anyone acting on our behalf is responsible for understanding and following the Code of Conduct. If a situation arises where the Code is unclear, employees should refer to Aspia’s other internal documents or seek guidance from their immediate supervisor or other responsible.

## **How do we create conditions for compliance?**

To ensure that all employees embrace the Code of Conduct, we aim to create a culture where challenges are openly discussed. Leaders play a crucial role in fostering this environment by setting an example, ensuring compliance, and providing direct feedback when needed.

At the same time, we encourage a collaborative atmosphere where all employees—regardless of role—remind each other of the Code’s values and provide constructive feedback to support one another in upholding these standards.

# Why, Vision, Mission and Values

Our Code of Conduct is based on our values, which encompass the beliefs that guide our actions. Our values are more than just words; they serve as our internal compass, steering us towards our vision. They guide us in our efforts to create added value, meet our customers' expectations, and earn their trust.

## Values

### Together

We believe in collaboration across borders.

We want ideas and individuals to grow with us through differences and collaboration in an inclusive, fun, and creative environment. No matter the competence, no matter the background, we believe in co-creation.

### Professional

We are proud professionals.

We take pride in our work. We are a progressive business partner and deliver high-quality services. We are humble but confident that our unique competence makes a difference for customers and colleagues. We strive to exceed expectations.

### Challenge

We dare to challenge.

We challenge the old to create the new by being curious and explorative. Approaching every problem with a bold and open mindset. We dare to challenge ourselves, our customers, and the industry. We share and care.

## Why

Aspia's Why, our purpose, why we exist:

"We believe in humans, in the opportunity to start something new, revolutionizing what used to be. Enabling humans to move forward. Together! We believe in you. And in our ability to make your dream come true, whatever it may be."

## Vision

The vision is a guide for us, in everything we do, every day. Where we see humans as the hub in sustainably growing companies and societies. Aspia's vision:

"Enabling business and human growth"

## Mission

Where the vision shows where we should always strive, the mission tells us how to get there.

"Your progressive business partner, driving efficiency and growth"

Aspia's mission tells us how we should be, how we should work. It tells us what is important and what is not important. It defines our purpose and focus.





# Human Rights

We are committed to upholding the highest standards of human rights in all aspects of our operations. Our commitment is guided by the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization's (ILO) core conventions. We respect all employees' rights to organize, the freedom of association, and the right to collective bargaining. We do not accept child labor or any form of forced labor.

We do not tolerate any form of discrimination and are dedicated to providing a workplace free from discrimination based on race, gender, age, disability, sexual orientation, religion, or any other status. All employees should be treated fairly and have equal opportunities to grow and develop within the company.



# Work Environment

We believe in creating a workplace where everyone feels valued, have fun, and develops. We see and encourage each other, invite and show care. We are generous with our knowledge and open about our challenges. We don't hesitate to help each other and appreciate the different perspectives it can bring. Together, we create a good workplace characterized by our values: together, professional, challenge.

We value open and honest communication among all employees. An open climate is essential for creating the dialogue and discussion needed to uphold our values and identify risks and shortcomings. Our workplaces should offer a physically, organizationally, and socially healthy and safe environment for all employees. Working conditions should promote a sustainable working life.

Therefore, we work systematically and health-promotingly to prevent accidents, injuries, and illnesses. Every employee is encouraged to take personal responsibility by identifying and reporting risks or shortcomings to their immediate supervisor.

We foster a culture of continuous learning. We should create opportunities for all employees to participate in training and education to develop their professional skills and knowledge. This ensures that we can provide even better service to our clients and support the growth and development of our team.

# Business Ethics

Business ethics are of great importance for both our daily tasks and our long-term work. Good business ethics are fundamental in all our areas of operation, and all employees must follow applicable laws, our internal control documents, and industry regulations for good professional practice. Aspia and many of Aspia's employees are members of industry organizations. In our advisory services, every employee should work according to the standards provided by such industry organisation.

## **Anti-Corruption, Representation, and Gifts**

We have a zero-tolerance policy towards corruption and bribery. Every employee is required to make decisions impartially, without regard to personal gain, and to avoid any activities that could create a real or perceived conflict between Aspia's interests and their own.

Events and representation organized by Aspia, or attended by Aspia employees, must always have professional relevance for the participants. Any elements of entertainment should be secondary and of limited value. We do not solicit, accept, or offer gifts, representation, or sponsorships that could influence - or appear to influence - our own or others' business decisions.

## **Anti-Money Laundering and counter-terrorism financing**

Every employee should work actively to prevent Aspia and its services from being used for money laundering or financing terrorism. Achieving thorough customer knowledge and understanding our clients and assignments are crucial measures to prevent such activities. Aspia will maintain procedures and processes to ensure compliance with anti-money laundering regulations.



# Data Privacy and Information security

Respecting privacy in all its aspects is fundamental to us. We are committed to collecting, using, holding, and processing personal and customer data responsibly, lawfully, and with the utmost care.

Violations in the processing of personal data can cause irreparable harm to individuals' rights to privacy. Personal data includes any information that could identify an individual, such as customer and HR-related information like names, contact details, and salaries. If you are unsure whether certain information qualifies as personal data, always err on the side of caution and treat it as such.

Everyone covered by this Code of Conduct has a duty of confidentiality regarding information accessed through our operations. Every employee is obliged to protect the information entrusted to us, including both customer information and details about our business processes, plans, financial information, and other internal affairs. This obligation to maintain confidentiality extends beyond working hours and continues even after employment with Aspia ends. Every employee should uphold good information security practices and follow Aspia's guidelines for information channels.





# Environment

We are committed to protecting the environment and conducting our operations with minimal negative impact to contribute to a sustainable development. We adhere to all applicable environmental regulations and strive to continuously inform and inspire our employees on environmental issues to increase awareness and engagement in our offices.

We prioritize digital collaboration with our clients and encourage digital meetings. When travel is necessary, we promote the most sustainable options available.

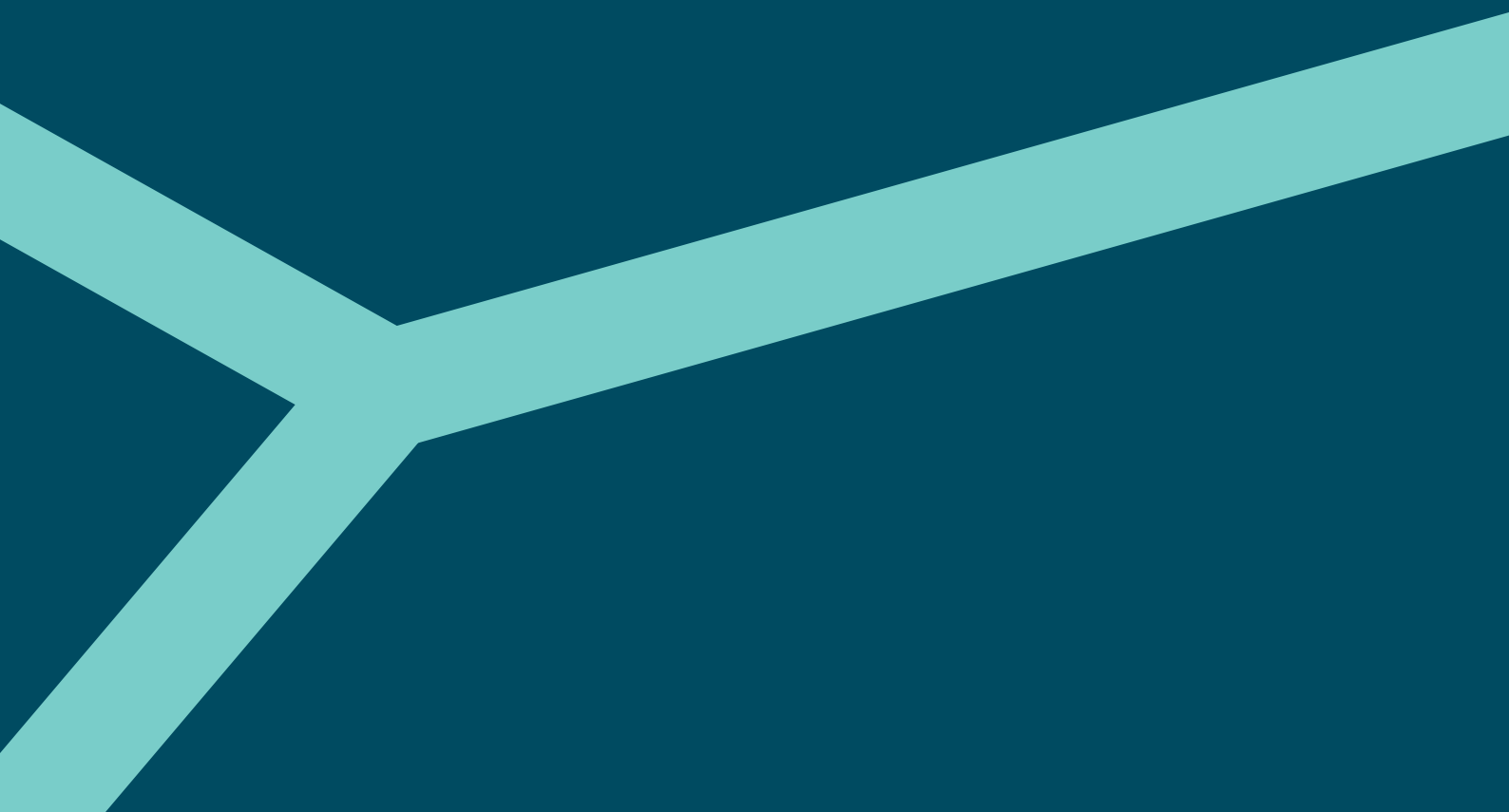
# Checklist for those covered by this Code of Conduct

Our Code of Conduct does not always provide answers on how you as an employee should act in different situations. Always use your common sense.

If you feel unsure, you can use the questions below:

- **Is it legal?**
- **Does it feel right?**
- **Is my action influenced by my personal interest or another conflict of interest?**
- **Would my action withstand public scrutiny?**
- **Could my decision affect trust in Aspia?**

Often, situations and considerations can be difficult, and there is rarely an easy answer. Never hesitate to consult a colleague or supervisor if you feel unsure. Guidance can sometimes be found in other internal control documents.



# Implementation and Follow-up

Aspia's CEO holds the ultimate responsibility for ensuring compliance with our Code of Conduct. The board of directors should receive regular reports on compliance and any deviations identified. Every employee is accountable for adhering to the Code of Conduct. Leaders and managers are responsible for ensuring that employees are informed about the Code and understand how to integrate it into their daily work. When onboarding new employees, including temporary staff, the Code of Conduct must be clearly communicated.

## What happens if the Code of Conduct is not followed?

Addressing issues promptly is often essential to prevent them from escalating. Anyone who raises a concern should not face any negative consequences as a result.

If an employee notices that the Code of Conduct or other internal control documents are not being followed, they are encouraged to immediately report this to their direct supervisor or manager. If they are uncomfortable doing so, they may alternatively reach out to HR or Legal.

Any report made by an employee must be handled confidentially, and the employee's identity should not be disclosed without their consent. All reported cases must be dealt with promptly and thoroughly.

As an additional tool to ensure compliance with our Code of Conduct, a whistleblower function was implemented in May 2022. The whistleblower channel, accessible via Aspia's intranet, allows employees and consultants at Aspia to report public interest concerns in a safe and confidential manner.