

**BUSINESS
FINLAND**

CODE OF CONDUCT

OUR WAY OF WORKING



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DIRECTOR GENERAL'S GREETING

Dear Business Finland colleagues,

We are doing important, international work to promote the success of Finland and of Finnish companies. We carry a great responsibility, so people need to believe in us and trust us. Trust is created by operating responsibly: we must use the funds granted to us and the information entrusted to us by our customers in a way that instills trust.

This Code of Conduct sets out the principles that will enable us to reach our targets. Business Finland's way of working is showcased in the way each of us does our work. Responsibility for ethical operations cannot be delegated to a specific unit or manager – everyone is responsible for their own behavior.

However, the purpose of our Code of Conduct is not to scare people or incentivize them to be overly cautious. In line with our values, we must drive things forward with passion and by thinking big, and seek new ways of working. The Code of Conduct does not restrain us – it will leave us plenty of space to experiment and do things.

The Code of Conduct lays the foundation on which we can build through agile experimentation.

Our values are compatible with our Code of Conduct. The Code of Conduct supports our culture of working together: it is our obligation to look at things from several perspectives. This will help us to operate responsibly in Finland's best interests. We value and respect our colleagues and actively involve them in working together.

Our values describe our *sisu* as follows: At the end of the day, only actions and results matter. We are the trusted guardians of Finland's future. Let's carry this responsibility with pride.

Pekka Soini
Director General

INTRODUCTION

The principles of the Code of Conduct are adhered to in every function and task worldwide in the Business Finland entity, which consists of the Innovation Funding Agency Business Finland and Business Finland Oy. Business Finland's Code of Conduct applies to every member of Business Finland's personnel, irrespective of the type and duration of their employment or assignment. Business Finland's contractual partners are also obliged to adhere to these principles in their operations related to the contractual relationship.

In addition to the principles included in the Code of Conduct, we comply with applicable laws and regulations in all of our activities. We are also familiar with the key legislation applying to our customers' activities.

The Code of Conduct creates a template for the way we work in accordance with our values.

Our values are **Passion**, **Sisu**, **Think Big**, and **All Together**.



PASSION



SISU



THINK BIG



ALL TOGETHER

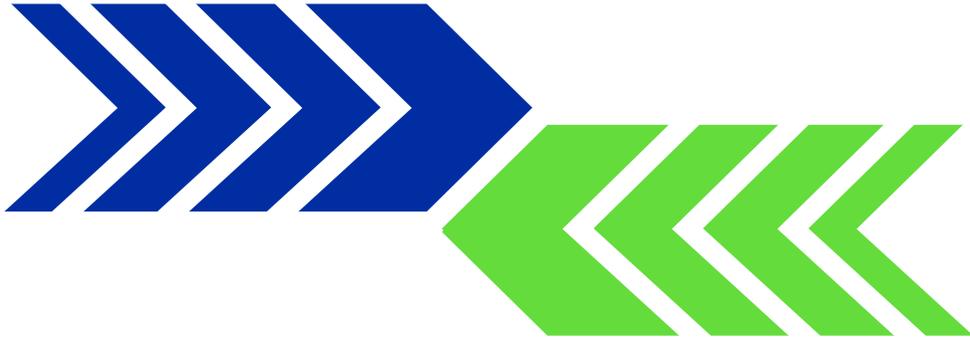
WE WORK IN A **FAIR AND RESPONSIBLE MANNER**



It is our job to promote the renewal of the Finnish economy, businesses and industries. We must operate responsibly in order to reach the targets set for our operations.

We use the public funds granted to us as efficiently and prudently as possible, and evaluate the impact of our operations regularly. We take the results of impact assessments into consideration when developing our operations.

We strive to engage in active, inspiring and open cooperation with other Team Finland partners, the ministry and other stakeholders. We are here for our customers. We continuously improve our operations so we can serve our customers better. We are agile, we have the courage to get involved with new things and be inspired by new opportunities, but also bear in mind the requirements imposed on our activities by legislation.



BUSINESS FINLAND AS AN EMPLOYER

We value diversity and promote equal treatment and non-discrimination in recruitment, remuneration, developing the competences of our personnel and career progression. We do not accept discrimination of any kind based on age, sex, ethnic origin, nationality, language, religion, belief, opinion, political activity, union activity, family relations, state of health, disability, sexual orientation or other personal attributes. We value and respect our colleagues and actively involve them in joint work.

We comply with laws and agreements concerning freedom of association, personnel representation, working times, salary payment and non-discrimination. We also comply with fair employment practices and respect internationally approved laws and agreements concerning employees' rights and working life.

We ensure that our working environment is safe and healthy. We do not accept harassment, abuse or bullying of any kind in our working community. The behavior and decision-making of Business Finland's leadership and managers demonstrate the significance of responsible and ethical operations. The management and supervisors are also responsible for developing and monitoring these operating principles.

EMPLOYEES' OBLIGATIONS

Business Finland's management is based on openness and trust. We are all committed to complying with jointly agreed instructions, regulations and principles, and building Business Finland's ethical operating culture. Every one of us is responsible for creating and maintaining an encouraging an open work atmosphere. Every one of us is entitled to good, respectful and dignified treatment. It is our responsibility to look at things from several perspectives. This will help us to operate responsibly in Finland's best interests. We look after Business Finland's interests in our work. Together, we are committed to taking care of Business Finland's property and treating our work tools appropriately. Our actions do not jeopardize or harm Business Finland's reputation or customer relationships.

We operate responsibly in terms of the environment. We aim to prevent and reduce the harmful environmental impacts of our operations and promote the efficient use of natural resources.

WE AVOID CONFLICTS OF INTEREST

We are disqualified from acting if we are in a position that could endanger our impartiality with regard to the matter at hand. In addition to the actual endangerment of impartiality, we are also excluded from acting whenever operations do not appear unbiased from an external perspective.

To avoid conflicts of interest and ensure impartiality, we comply with the disqualification regulations and internal principles applicable to our operations or the pertinent part thereof. We do not participate in preparing, presenting or making decisions on matters when we are disqualified. We evaluate our own ethicality ourselves and take the initiative to disqualify ourselves from acting when necessary.

We do not accept secondary employment that might jeopardize the impartiality of our operations or that would require us to use working time to discharge duties belonging to the secondary employment. We inform our managers of all of our commitments and seek the appropriate consent for our secondary employment. We refrain from taking part in any activities that conflict with our duties for Business Finland.

We also take ethical perspectives into consideration when making internal decisions within Business Finland. We inform our managers of personal relationships that are relevant to internal decisions and that could jeopardize impartiality when the decision is taken and, if necessary, we take the initiative in excluding ourselves from acting.



At the end of the day, only actions and results matter. We are the trusted guardians of Finland's future. Let's carry this responsibility with pride.

Pekka Soini
Director General, Business Finland

HOSPITALITY AND RESISTANCE TO BRIBERY AND CORRUPTION

We are the trusted guardians of Finland's future. Business Finland does not accept bribery or corruption in any form. We comply with the principles of opposing bribery and corruption in all of our operations and duties. We operate in accordance with the law and Business Finland's guidelines for resisting bribery.

We do not accept or request gifts that are very valuable, that differ from conventional gifts, or that exceed the thresholds of reasonable business hospitality. In addition, we do not promise or offer such gifts. We never accept or offer monetary gifts or gifts that might harm Business Finland's reputation or public trust in Business Finland. We also do not accept recurring gifts from the same people or organizations.

We only take part in events arranged by external parties if there is a genuine, documentable reason for this related to Business Finland's operations.

We comply with Business Finland's internal guidelines for entertainment, hospitality and travel.

If we are uncertain, we operate cautiously and contact our supervisors or the Legal, Admin, Facilities & Compliance unit. We bear in mind that bribery and corruption could lead to criminal sanctions.

WE MAKE RESPONSIBLE PURCHASES

We run competitive tender processes in an appropriate and unbiased manner, as required by legislation and our procurement guidelines. We aim to use public funds as efficiently and prudently as possible.

We decline all benefits offered during the procurement process and thereafter.

WE TAKE CARE OF **CUSTOMER DATA**

PRINCIPLES OF CUSTOMER WORK

We treat our customers in an unbiased, equal and appropriate manner.

We know our customers. We do not finance or advise parties that engage in money laundering or other illegal activities. If necessary, we clarify the identity of the person acting on behalf of the customer and identify the beneficial owners of the customer.

INSIDER INFORMATION

We do not use insider information obtained while working, or in any other way, in violation of laws, regulations and Business Finland's insider information guidelines. We do not trade in securities on which we have insider information. We also do not disclose insider information to external parties until the information is published.

UPHOLDING THE CONFIDENTIALITY OF INFORMATION AND PERSONAL DATA

We comply with information security guidelines and rules, and we exercise adequate care and caution when we process data and use information systems.

We always treat the information we receive from our customers as strictly confidential. We only look at confidential information when this is necessary to discharging our duties. We never make confidential information available to third parties.

However, we may disclose our customer information in certain circumstances on the basis of law or the customer's express consent, particularly in situations involving Team Finland entities participating in offering company services.

We comply with the applicable laws whenever we process data and take care of privacy protection when processing personal data.

WE FOLLOW THE INSTRUCTIONS WE HAVE BEEN GIVEN



We carry our responsibilities with pride. Every member of Business Finland's personnel must be familiar with the Code of Conduct and related detailed guidelines, and must comply with these documents.

Acting in violation of the Code of Conduct could cause significant harm to Business Finland. Breaching the principles included in the Code of Conduct could lead to disciplinary measures for the guilty party. The consequences may be an admonition or warning, or termination or rescission of the employment or service contract.

OBLIGATION TO REPORT MALPRACTICE

We report all incidents of malpractice to our supervisors. If necessary, we may also contact internal audit or submit an anonymous report via the whistleblower channel. All reports are treated confidentially and appropriately in accordance with regulations. Reporting suspected incidents of malpractice will not adversely affect the position of the reporting party at Business Finland.

BUSINESS FINLAND

Business Finland is an accelerator of global growth. We create new growth by helping businesses go global and by supporting and funding innovations. Our top experts and the latest research data enable companies to seize market opportunities and turn them into success stories.

www.businessfinland.fi