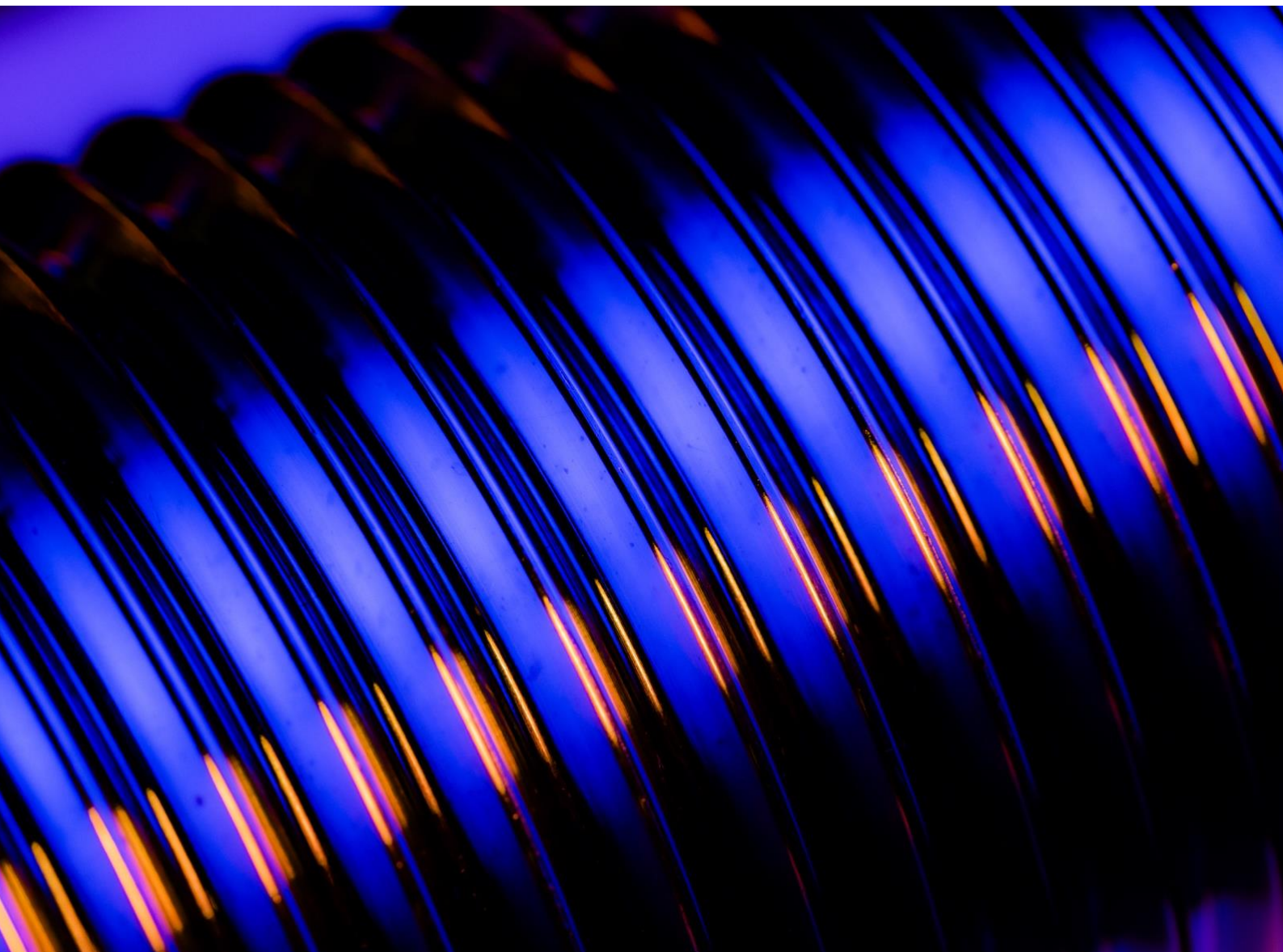


CODE OF CONDUCT

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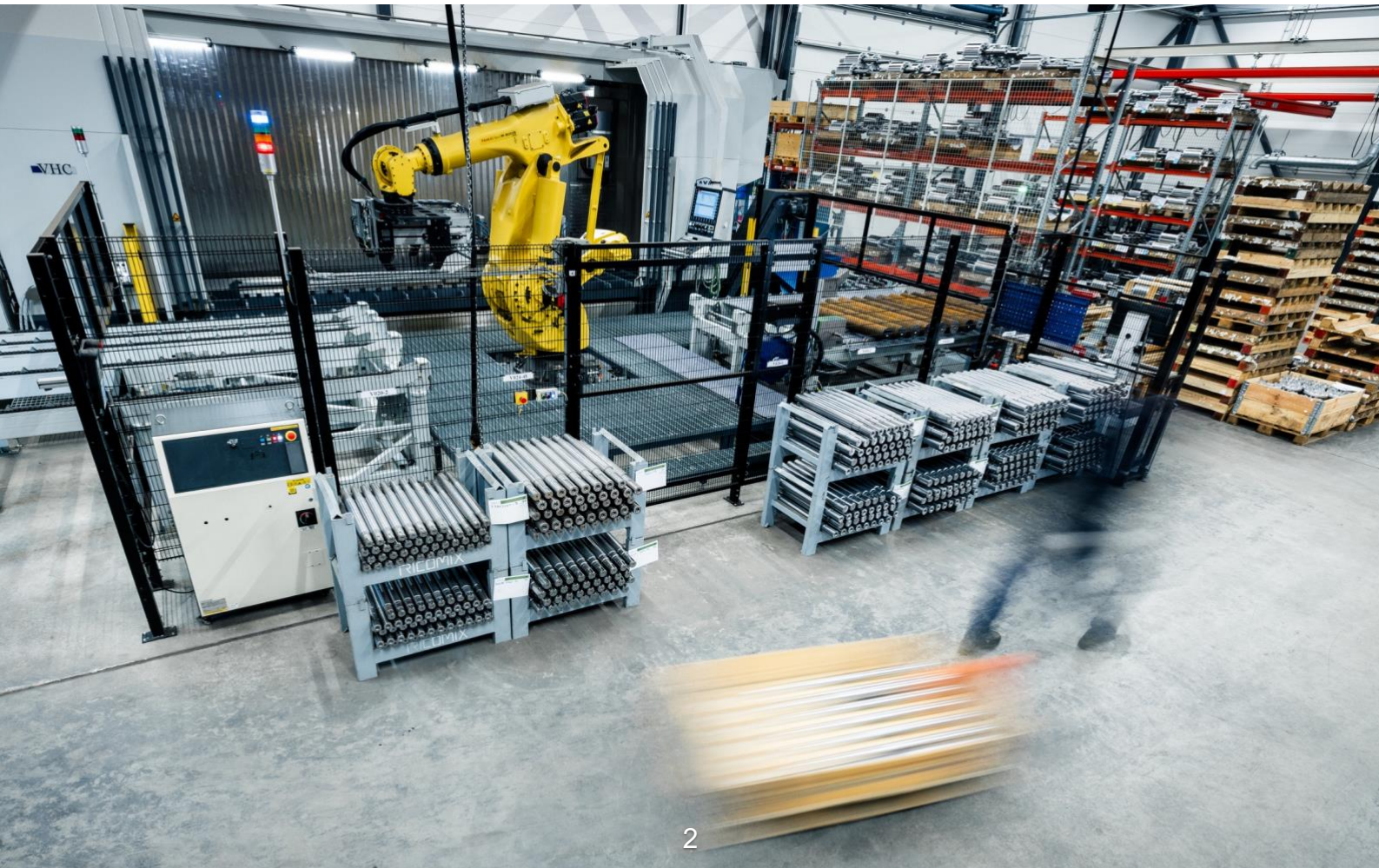
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INTRODUCTION



Message from our CEO

You are now holding ITA Nordic Oy's Code of Conduct. This document defines what kind of company ITA is and guides us to act according to our values in the situations we encounter daily. We do not cut corners, as we can only take pride in success achieved the right way. We are committed to considering people, the environment, and business laws and regulations in our ethical practices. Our goal is to promote a safe and diverse culture throughout our organization. The Code of Conduct is an essential part of our principles and applies to all of us working at ITA every day. This guide helps us all better understand our ethical practices.

Tommi Laakso
CEO ITA Nordic Oy

Why we have a Code of Conduct

- Describes what acting correctly and honestly means: What kind of actions and behaviors are encouraged/not encouraged.
- Describes the channel and procedures for reporting unethical or concerning issues and how they are addressed – violations must be reported without fear of retaliation.

APPLICATION

To what does the Code of Conduct, i.e., the company's ethical principles, apply?

- Intended for everyone – company employees, management, the board of directors, and stakeholders.
- Support the company's sustainable and responsible operations.



ITA NORDIC'S VALUES

We are committed to our customers' success, work with a positive attitude, and keep our promises.

We work as a team, we have the best people, and we trust that our staff will do their jobs to the best of their abilities.

We grow boldly and profitably, always aiming higher and ensuring continuity.

We act responsibly; for us, responsibility means taking care of people, the environment, and the economy.



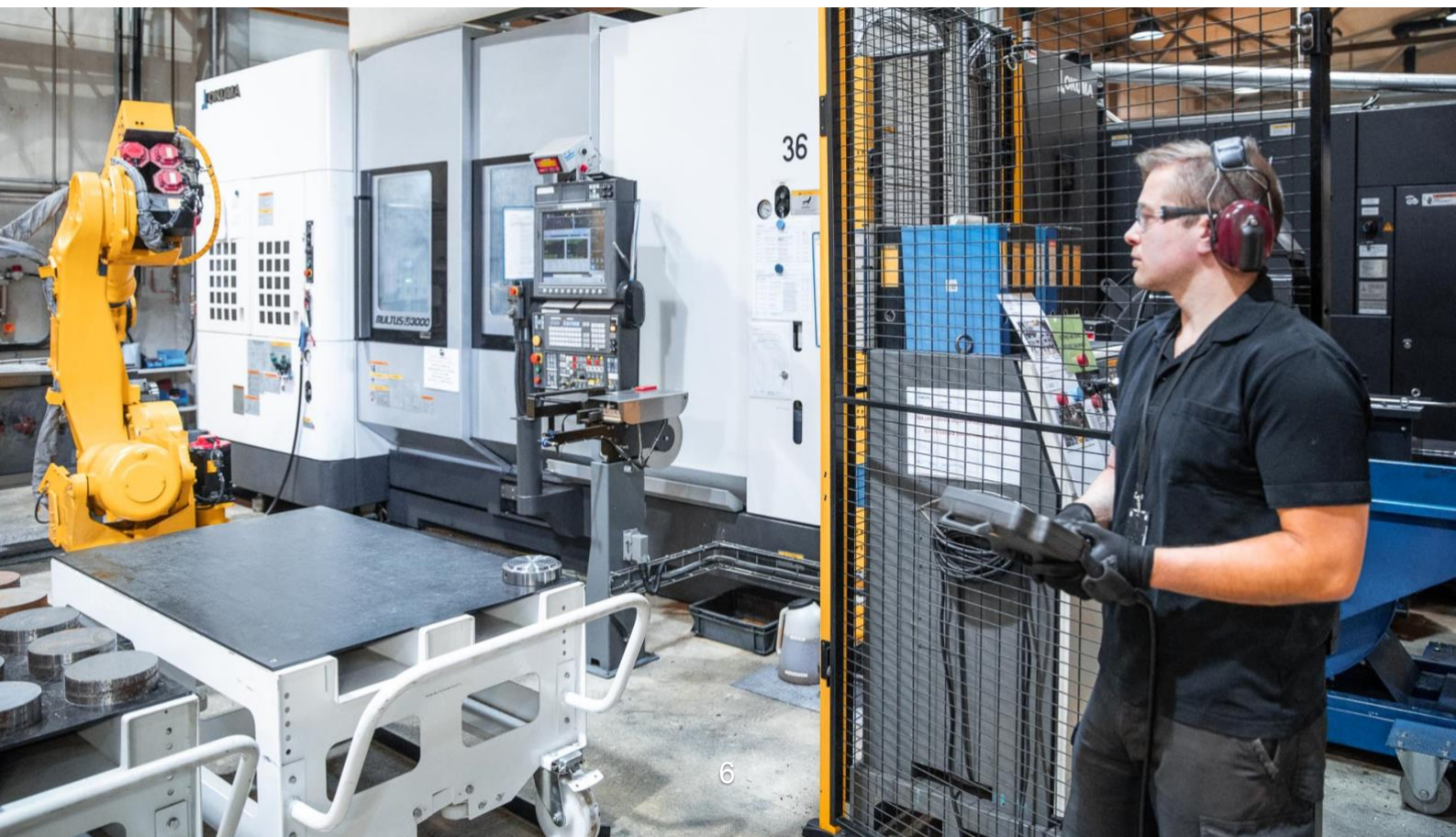
RESPONSIBILITIES AND OBLIGATIONS

Employees

- I read the instructions, understand them, and act according to our ethical guidelines.
- I openly raise my concerns if I notice any issues in the procedures.
- I ask for help if I don't know how to proceed.

Leaders

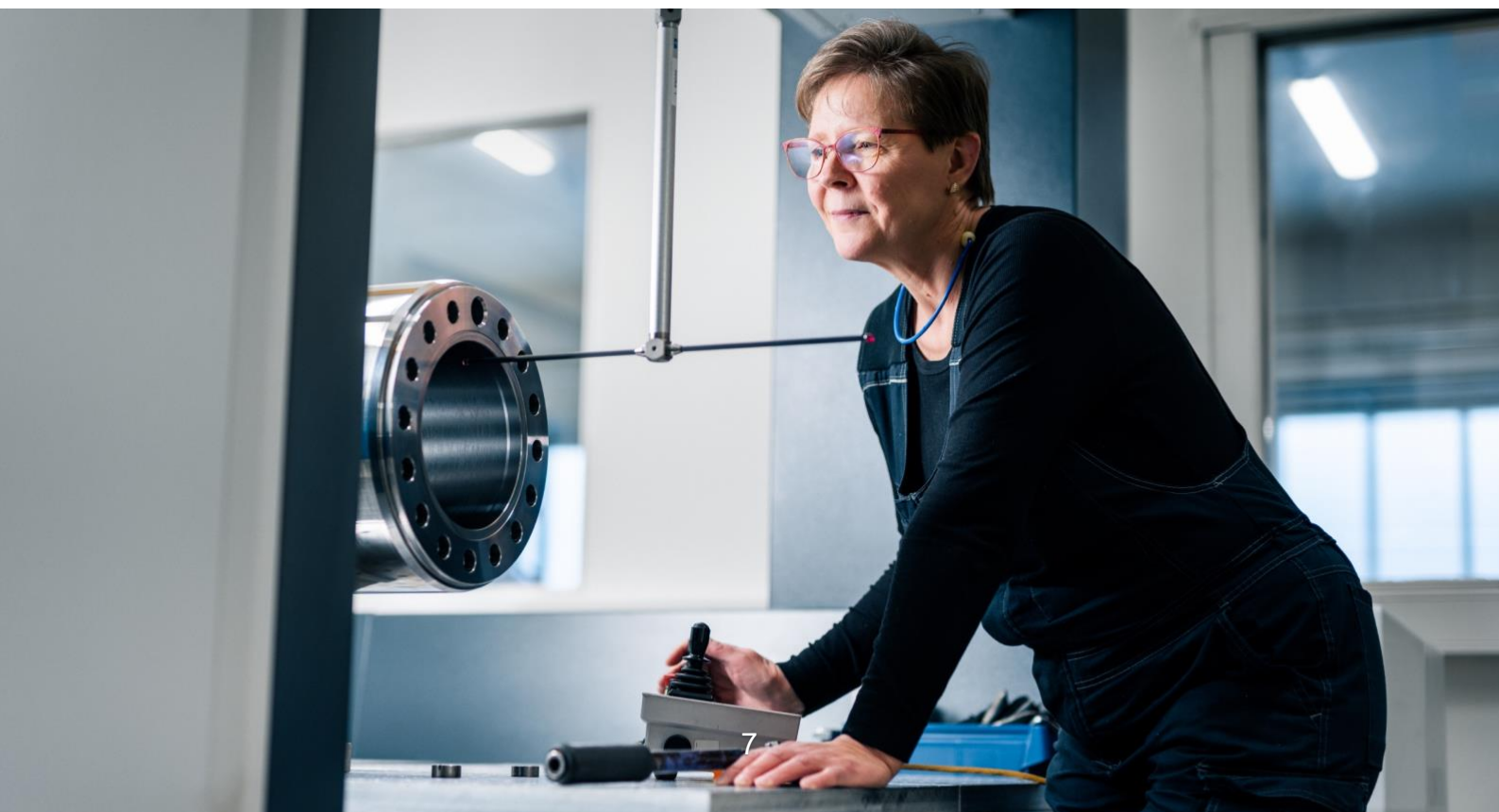
- I lead by example.
- I ensure that employees are familiar with our ethical guidelines and know how to act in different situations.
- Through my behavior, I create an atmosphere of trust so that issues can be raised without fear of retaliation; I listen to concerns and act confidentially.
- I guide and support adherence to procedures in all interactions.



PEOPLE

We respect our employees and treat them fairly and equally. We comply with laws and regulations concerning our employees.

- **Zero tolerance for harassment, equality, and non-discrimination** – We do not discriminate against anyone. We treat all our employees equally, valuing and respecting their rights. All forms of harassment, both physical and psychological, are prohibited. We guarantee a peaceful working environment for everyone.
- **Compensation** - Employees are paid a salary appropriate to their position and job description on time.
- **Working Hours** - We comply with laws and regulations related to working hours.
- **Work safety** - Employees are guaranteed a safe working environment. They are trained for their tasks, and employees perform duties for which they have received training and orientation.
- **Communication** - Communication and messaging are clear and respectful towards all parties.



ENVIRONMENT

We are committed to promoting sustainable development – we reduce emissions and waste, and use water and energy resources as sparingly as possible.

- **Laws and regulations** - We comply with environmental laws and regulations.
- **We are committed to promoting sustainable development** – we reduce GHG emissions and waste, and strive to recycle as much of our waste as possible. We use water and energy resources as sparingly and environmentally friendly as possible.



BUSINESS

ITA Nordic is committed to conducting all its business with high moral standards, in compliance with laws and regulations.

- **Fair competition** - We comply with laws and regulations.
- **Data security and IT safety** - We act diligently and responsibly in matters related to data security and IT safety.
- **Gifts, representation, and sponsorship** - We do not accept corruption and bribery.
- **Communication** - We communicate respectfully and responsibly across all our channels.
- **Protecting company assets** - We protect our own and our customers' intellectual property and brand, and handle confidential information responsibly.
- **Working with third parties** - We only engage with parties who are committed to ethical and responsible practices.
- **Conflicts of Interest and Impartiality** - We act in the best interests of ITA Nordic and do not engage in activities that may conflict with ITA Nordic's operations or harm the company's reputation.



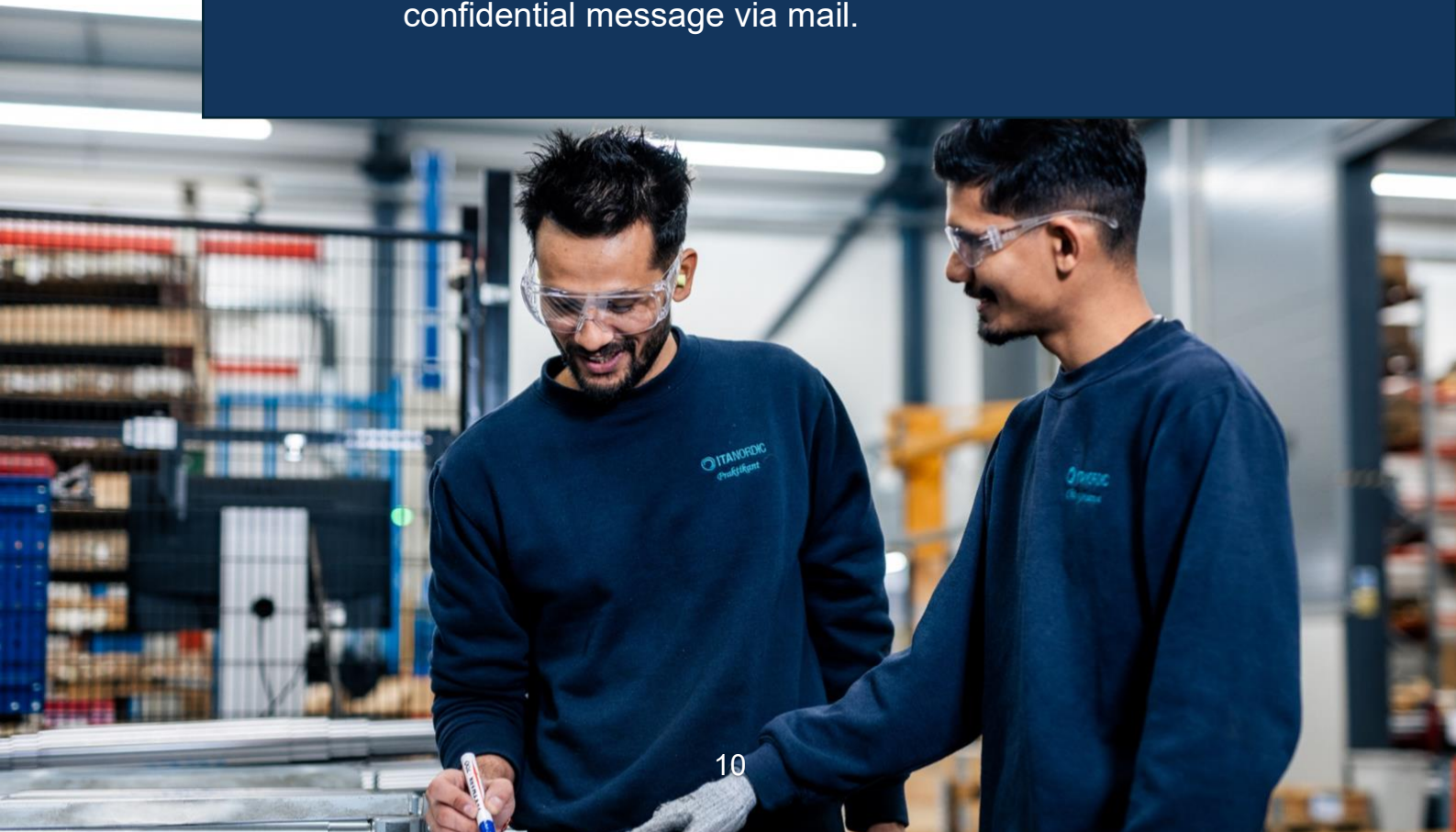
WHAT I DO NOW?

Code of Conduct in practice

- Everyone is responsible for their own actions.
- Ethical violations are addressed, and illegal activities are reported to the authorities.
- If you notice any misconduct, you are obligated to report it.
- Reports are handled carefully and confidentially, and they do not result in retaliation.

Report of concern or misconduct:

1. Bring up the action or event with your supervisor.
2. If you don't think your supervisor is the right person to address your concern, contact the CEO.
3. For a suspected violation, you can send an anonymous or confidential message via mail.



CONTACT

+358 20 155 1400

Tyvitie 2, 56510 Puntala

www.itanordic.fi





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