PINJA

CODE OF CONDUCT



At Pinja, we bring clarity and control to complex industrial operations, helping companies run efficiently, responsibly and sustainably. Our purpose is to turn complex data into clear insights that empower organisations to make better decisions and build a more sustainable future.

Acting responsibly, ethically and in compliance with the law and regulations is both a duty and a commitment. It means respecting one another and honouring the trust placed in us by our owners, customers, employees and all stakeholders.

Our values, We care, We innovate, We are genuine and We work together, guide everything we do. They are the foundation of our culture and central to these ethical guidelines, which describe how we work and provide tools for making the right decisions every day.

The Code of Conduct is one of the foundations of our culture.
It reminds us that our daily actions shape
the long-term future of our business.

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Every Pinja employee is expected to familiarise themselves with these guidelines and apply them in their daily work. By doing so, we ensure together that Pinja remains a reliable and responsible company, now and in the future.

Our shared responsibilities:

Know the Code of Conduct guidelines and where to find related materials.

Follow the guidelines and ask for advice when needed.

Complete all required training on time.

Report any observed issues or violations.

In addition, team leads are responsible for:

Supporting their team in understanding and applying the Code of Conduct.

Addressing issues or misconduct immediately and fairly, and acting as role models.

Taking the guidelines into account when setting goals and managing performance.



PINJA

1. ACTING ETHICALLY AND RESPONSIBLY

We are genuine in all we do. Acting openly, honestly and in compliance with laws is the foundation of our business everywhere we operate.



We follow laws and regulations

At Pinja, we follow local and international business laws and regulations, which guide our operations and choices. Acting lawfully and responsibly helps us build trust with all our stakeholders. We do not tolerate violations of laws and expect the same commitment from our stakeholders.

Pinja has a reporting channel in accordance with the whistleblowing regulation, through which anyone can make a confidential report of misconduct or suspected wrongdoing.

What does it mean for me?

Stay informed about the laws and standards relevant to your work.

Make choices that align with both the law and Pinja's ethical guidelines.

If you notice or suspect misconduct, start by talking with your team lead. If that is not possible, you can always use the whistleblowing channel.



We avoid corruption and bribery

We have zero tolerance for bribery and corruption in any form. This means we never offer, promise, give, request, or accept anything of value to gain an improper business advantage. We comply with all applicable anti-corruption and anti-bribery laws, including Finnish law, the EU anti-corruption framework, and international conventions.

We also expect our customers, suppliers, and partners to uphold the same standards.

What does it mean for me?

Do not accept or offer money, gifts or other benefits that could influence decisions.

Follow Pinja's and the customer's hospitality principles, as outlined in our Responsible Trading Policy.

When in doubt, ask for advice before acting.

We compete fairly

Pinja complies with competition laws and regulations. We don't engage in any activities forbidden by law such as anti-competitive agreements or anti-competitive mergers and acquisitions.

We follow the principles set out in the Finnish Competition Act, EU competition rules and local laws relevant in the countries we operate.

What does it mean for me?

Do not share or discuss pricing, market plans or other confidential information with competitors.

If you are unsure about a situation, seek guidance before taking action.



We strive for financial responsibility

We are committed to transparency in financial reporting. All transactions are recorded according to accepted accounting principles. We follow FAS (Finnish Accounting Standards) and other applicable regulations, and we ensure our company is never used for money laundering.

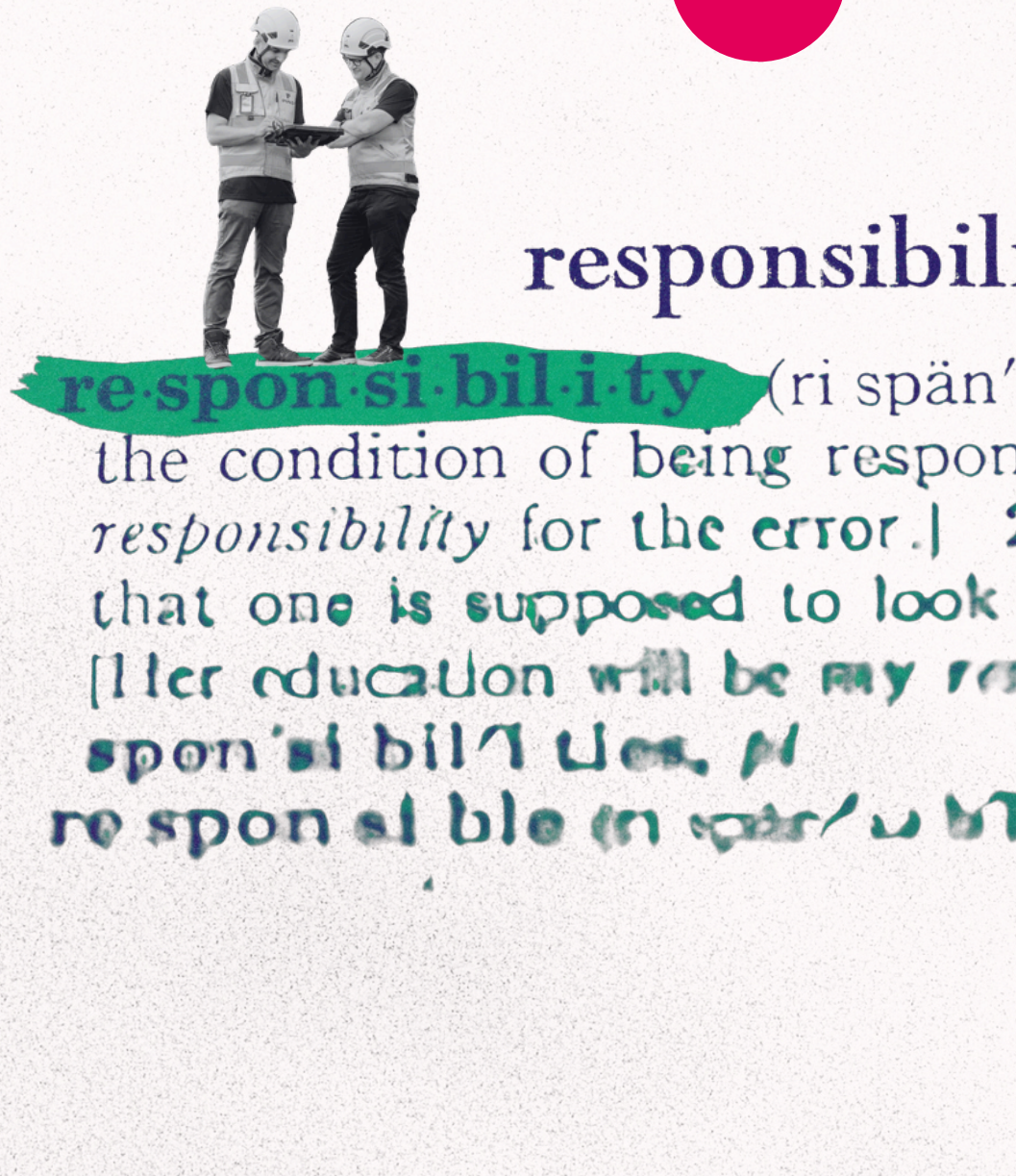
We also fulfil all our obligations related to taxes and social security contributions on time.

What does it mean for me?

Record your working hours accurately and on time.

Follow approval processes for expenses and purchases.

Check that invoices are correct, including prices and supplier details.





2. CARING FOR OUR PEOPLE AND CULTURE

We care for our people. At Pinja, well-being, growth and respect for diversity are the cornerstones of a safe and inspiring workplace.

We care about well-being and work-life balance

We strive to promote a safe and supportive working environment. This means quality leadership, good teamwork, a functional workplace and access to occupational health, insurance, HR services and our early support model.

At the same time, we recognise that life outside of work matters. While work is important, flexibility and balance are essential so that everyone has time for personal life, health and recovery. We encourage employees to take care of themselves and participate in sports, culture and social activities.

What does it mean for me?

Take care of your own well-being and support your colleagues.

Remember that you have access to comprehensive occupational health services and use them when needed.

If your workload feels too heavy, talk to your team lead and ask for help.



We grow and develop professionally

At Pinja, we want employees to see a long-term future with us. That is why we support professional growth and provide opportunities to learn new skills. Training, sharing best practices and learning from colleagues are key ways to develop further and strengthen expertise together.

Regular conversations with your team lead about your development and career goals are also a great way to move forward in your career within the company.

What does it mean for me?

Use learning opportunities to grow.

Share your knowledge and learn from colleagues.

Keep an open and curious mindset – innovation starts with continuous learning.

We foster a safe and respectful workplace

Pinja does not tolerate harassment, bullying, or any other inappropriate behaviour.

If such behaviour occurs, we take it seriously and address it immediately either through direct discussion, HR support, or a formal investigation when needed.

What does it mean for me?

Treat everyone with respect, fairness and dignity.

Do your part in creating a safe and supportive workplace for all.

If you experience or witness inappropriate behaviour, speak to your team lead or HR, or report it through the whistleblowing channel.





3. CARING FOR THE ENVIRONMENT AND SOCIETY

We work together with our customers to build sustainable and innovative solutions that reduce environmental impact and strengthen long-term competitiveness.

Customer impact

Together with our customers, we are building a more sustainable world. We help organisations enhance operational efficiency and optimise resource utilisation by leveraging digitalisation and data-driven insights.

Smart technologies are transforming industrial processes and supply chains, ensuring that sustainability is a key enabler of business success, not just an additional benefit. Supporting our customers in achieving their sustainability goals also strengthens their long-term competitiveness in an evolving market.

What does it mean for me?

Understand how Pinja's solutions support our customers' sustainability goals.

Keep sustainability in mind when contributing to customer projects and solutions.

Share new ideas and innovative ways to help customers reduce their environmental impact or improve safety.



Our own responsibility

At the same time, we recognise our own role and responsibility. Every activity has an environmental footprint, and we are committed to minimising ours.

We comply with environmental regulations, practice responsible sourcing, and take care of waste management, including electronic waste (such as computers, phones, batteries and other office equipment). By making sustainable choices in our daily work, we reduce our negative footprint and increase our positive handprint together.

What does it mean for me?

Be mindful of the environmental impact of your daily work.

Avoid unnecessary travel, and prefer carpooling or public transport when possible.

Take care of recycling and electronic waste responsibly, following local rules at the office.

We respect human rights

We want to ensure that the rights of all people who work at and with Pinja are protected. We comply with international principles such as the Universal Declaration of Human Rights, ILO International Labour Standards and OECD Guidelines for Multinational Enterprises.

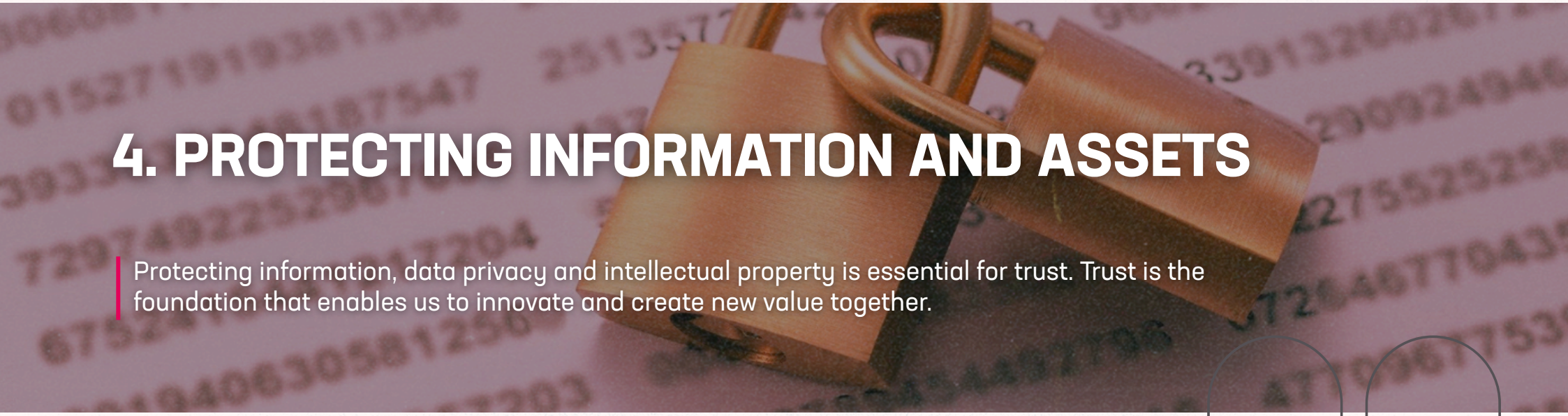
We respect freedom of association, collective representation, fair employment and compensation, equal treatment and safe working conditions. We do not tolerate human rights violations and expect the same commitment from employees, customers, subcontractors and other stakeholders.

What does it mean for me?

Treat everyone with respect, fairness and dignity in daily work.

Support an inclusive and safe working environment for colleagues and partners.

Report any concerns about human rights violations to your team lead or CHRO, or through the anonymous reporting channel.



4. PROTECTING INFORMATION AND ASSETS

Protecting information, data privacy and intellectual property is essential for trust. Trust is the foundation that enables us to innovate and create new value together.

We ensure information security & data privacy

We are committed to upholding the highest standards of information security and protecting the sensitive data entrusted to us by our customers, partners, and employees. This commitment is an integral part of our operations and a foundational pillar for building and maintaining trust with all our stakeholders.

We operate a mature Information Security Management System (ISMS) that is certified to the ISO 27001 standard. This framework ensures we proactively identify and manage risks, comply with all applicable laws and regulations, and continually improve the resilience of our customer-facing services and our business.

What does it mean for me?

Only access and use data for a legitimate business purpose required by your job.

Respect confidentiality and follow all security policies, guidelines, and confidentiality agreements (NDAs).

Promptly report any suspicious activity, security incidents, or concerns to the Secure Team.

Complete all required security training and the annual awareness exam.

Stay vigilant against cyber threats like phishing, and always think before you click.

We protect our intellectual property

We are committed to protecting our intellectual property, which includes both registered rights (such as patents and trademarks) and unregistered rights (such as copyrights and know-how).

Pinja's intellectual property must only be used when it is relevant for your work tasks.

What does it mean for me?

Use third-party intellectual property, including open-source software, only in accordance with its licence terms.

Use Pinja's intellectual property responsibly and only for work purposes.

Work responsibly with artificial intelligence and follow Pinja's AI Toolset Policy. Ensure that confidential, personal or copyrighted material is not entered or generated inappropriately.

If you notice a potential violation of intellectual property rights, report it to management immediately.





5. KEY SOURCES AND REFERENCES

Pinja's corporate governance policies and sustainable business principles guide our daily work.

All policies and principles are found in HiBob.

Responsible business conduct

- ESG Policy
- GDPR Policy
- Compliance Program
- Code of Conduct
- Whistleblowing Policy
- Anti-corruption Policy
- Anti-trust Policy

People and leadership

- Values
- Leadership Principles & Promises
- Training Promise
- Occupational Health and Safety Policy
- Human Rights Policy
- Equality and Non-discrimination Policy

Customers & supply chain

- Responsible Trading Policy
- Supplier Code of Conduct
- Sanctions Policy
- Crisis Management Policy
- Third-party Risk Management Procedure

Security and data privacy

- Information Security Policy
- Data Protection Policy
- Artificial Intelligence (AI) Toolset Policy
- Dawn Raid Procedures

Relevant sources that, along with laws and regulations, guide the development of Pinja's instructions and policies:

UN Sustainable Development Goals (SDGs): A collection of 17 global sustainability goals

UN Global Compact: Principles-based framework that addresses ethical business conduct

OECD Guidelines for Multinational Enterprises: Recommendations for multinational enterprises that provide principles and standards for responsible business conduct

The Universal Declaration of Human Rights: An internationally recognised standard for the protection of fundamental human rights

ILO International Labour Standards: Standards that set basic principles and rights at work

United Nations Convention against Corruption: Universally accepted anti-corruption instrument


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