



**PINJA**

Code of Conduct

Forewords	3
This is Responsible Pinja	4
<b>1. Pinja and Ethical Business Conduct</b>	<b>5</b>
<b>2. Pinja and Sustainability</b>	<b>8</b>
<b>3. Pinja and our Employees</b>	<b>11</b>
<b>4. Pinja, Information Security and Protection of Assets</b>	<b>15</b>
Guidelines and Relevant Sources	17

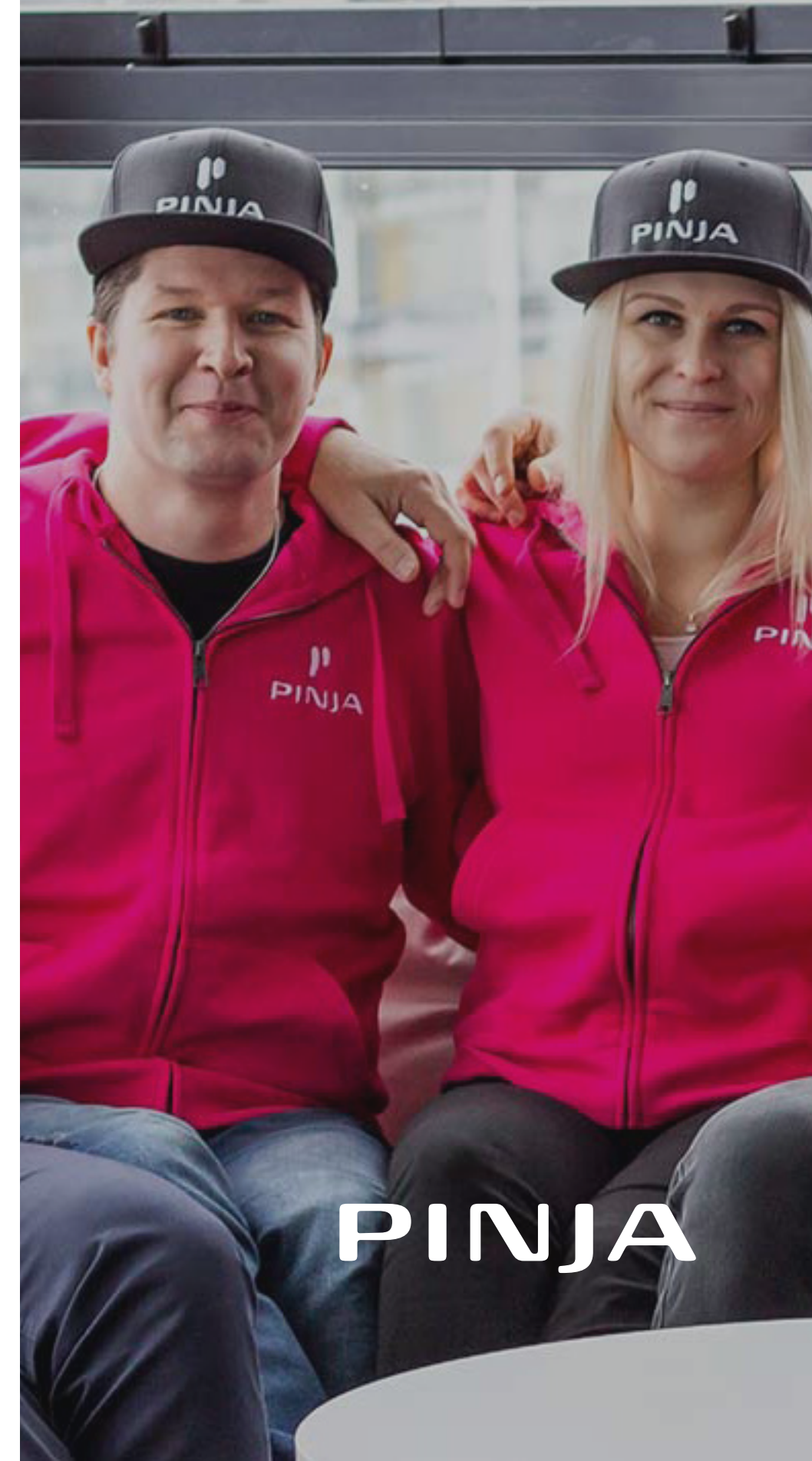
**”** *The way we as a company interact with society, other companies and people is an important part of our identity. It is our duty to our owners, customers, employees and all stakeholders to act responsibly, ethically and as required by law.*

*The Code of Conduct is one of the cornerstones of our operating culture and values. We make both small and large-scale choices and decisions every day. In doing so, we build and influence our sustainable business future. It is important to keep in mind that many of our choices can affect our reputation.*

*Every Pinja employee is required to read these instructions and apply them in their daily work. Together, we ensure that Pinja is known as a reliable and responsible player now and in the future.*



**Veli-Matti Nurminen, Pinja CEO**  
3.3.2021

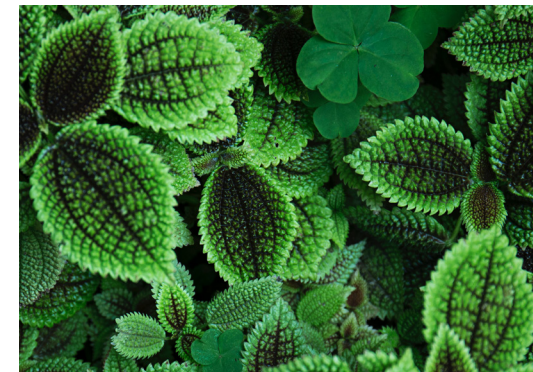


# PINJA



## Pinja and ethical business conduct

- We follow laws and regulations
- We avoid corruption and bribery
- We compete fairly
- We strive for the financial responsibility



## Pinja and sustainability

- We create positive sustainability impact
- We minimize our negative environmental impact
- We respect Human Rights



## Pinja and our employees

- We remember about well-being & safety of our employees
- We remember about life outside of work
- We advance professionally
- We avoid harassment and bullying
- We create diverse and equal culture



## Pinja and information security & protection of assets

- We ensure information security & data privacy
- We protect our intellectual property

# **1. Pinja and Ethical Business Conduct**

At Pinja, we are committed to the responsible business and management of our day-to-day operations and decision-making process.



## We follow laws and regulations

At Pinja, we comply with local and international business laws and regulations. Compliance with laws and regulations is the ultimate guiding factor in our operations and choices. 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 abuse, suspicion or concern.



### What does it mean for me?

- Keep yourself aware and up-to-date about laws, regulations and standards which are relevant to your work

## We avoid corruption and bribery

We have zero-tolerance for bribery and corruption and we comply with all relevant national and international anti-corruption laws. We expect our suppliers, customers and other stakeholders to behave the same way.



### What does it mean for me?

- Don't accept or offer money or other benefits that can influence the decision-making process
- Comply with our hosting & gift policy



## 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 principles guided by the Finnish Competition Act, EU competition rules and local laws relevant in the countries we operate.



### What does it mean for me?

- Don't discuss or share pricing or other confidential business information with competitors whenever it is in conflict with competition regulation

## We strive for the financial responsibility

We are committed to providing our internal stakeholders with information on our financial performance in a transparent way.

We record all financial transactions in accordance with locally accepted accounting principles. We follow FAS (Finnish Accounting Standards) as well as other regulations, rules and policies associated with accounting in all Group reporting. We also ensure that our company is not used for means of money laundering.

We fulfil all our obligations related to taxes on-time (e. g. withholding taxes, value-added taxes and income taxes) as well as social security payments and insurances.



### What does it mean for me?

- Record work hours on time
- Follow the approval rules
- Check the accuracy of invoices in respect to price and supplier responsibility



PINJA

## **2. Pinja and Sustainability**

We would like to address environmental and social issues relevant for our business, improve our performance and create a positive impact through customer projects.



### We create positive sustainability impact

We create positive environmental, social and economic impact through our work. Most of our solutions aim at helping our customers to improve material and energy efficiency, increasing safety at work and contribute to their economic growth through technological innovations.

We are aware that we are a part of a bigger community, and through our solutions we aim to help other companies to reduce their environmental impact and carbon footprint. We create a bigger positive impact and carbon handprint by using our skills and knowledge.

”

*Example from food industry: reduction of freezer storage requirement by over 20% and waste due to inadequate shelf life by 25%.*

### We minimize our negative environmental impact

Every human activity has its environmental impact, so does Pinja's. We comply with environmental regulations relevant for our business. We try to minimize the impact Pinja has on the environment by committing to responsible sourcing and appropriate waste management, including e-waste.



#### What does it mean for me?

- Be aware of environmental impact your day-to-day work has
- Try to avoid traveling when it is not necessary, and favor carpooling and public transport whenever possible
- Take care of waste disposal and material recycling in the office in accordance with local regulations



### We respect Human Rights

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

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

”

*Treat others as it is best for them.*



### What does it mean for me?

- Treat others as it is best for them
- Report any violations of human rights to your supervisor, Human Resource Director or through an anonymous notification channel

### **3. Pinja and Our Employees**

We care about social responsibility and people. Employees' well-being and the quality of work life are important for Pinja. We live by our values and see diversity as a source of strength. That is why we are committed to creating a safe, open and transparent culture where employees can professionally grow, have a good work-life balance and enjoy challenging work. All these factors shape our work culture, where enthusiastic and skilled people can reach their goals.



### We keep well-being & safety of our employees in mind

We strive to promote a safe working environment and wellbeing at work. That is done by quality supervisory and teamwork, through a functional work environment, by maintaining everyday basics such as; occupational health, insurance, HR services and early caring model. In the decision-making process, we take into consideration the opinions of our employees and improve our processes accordingly. We participate in working life research programs to better understand the future of learning and work.



#### What does it mean for me?

- Mind your own and your colleagues' well-being at work
- Ask for help when you need it!
- Work and travel safely, mind the safety rules
- Report any safety observations through the safety notification channel
- Familiarize yourself with the Employee Handbook for more information

### We remember about life outside of work

At Pinja we support employee work-life balance. While work is important, it is also crucial for us to be flexible enough so our employees have enough time for their personal life.

Pinja encourages employees to take care of their personnel health and support activities in sport and culture as well as off-work social events and social networks.



#### What does it mean for me?

- Take care of your and your colleagues' work-life balance
- Enjoy life and remember to take breaks during the working day

### We advance professionally

Training our people is important for Pinja, we would like to ensure that employees can see a long-term future and opportunities in the company. That is why we support your professional growth and desire to acquire new skills and knowledge. We constantly look into the best practices and try to develop professionally.



#### What does it mean for me?

- Take the opportunity of trainings and learning
- Experienced colleagues and internal networks are meant to help and guide you
- Be curious and open to lifelong learning

### We avoid harassment and bullying

Pinja employees deserve fair treatment. At Pinja we have zero tolerance for physical or emotional harassment and bullying or any other form of inappropriate or abusive behavior.



#### What does it mean for me?

- Treat others as it is best for them
- If you notice inappropriate behavior against yourself or your colleague, report it to your supervisor, Human Resource Director or through an anonymous notification channel
- Familiarize yourself with the Employee Handbook for more guidelines



### We create a diverse and equal culture

At Pinja we accept you the way you are. That is why we have no tolerance for discrimination and we are committed to providing equal opportunities for all employees and applicants interested to work at Pinja. We are closely cooperating with educational institutions to give opportunities to recent graduates to start their careers and develop professionally.

Together with our employees, we are striving to create a diverse and inclusive culture. We value professional skills which by no means are affected by gender, race, nationality, religion, or any other characteristics.

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*Let's build Pinja's positive culture together!*



### What does it mean for me?

- I respect my colleagues as they are and avoid personal biases
- “I get to be myself”
- Let's build Pinja's positive culture together!



### **3. Pinja, Information Security and Protection of Assets**

Considering the nature of our operations, information security and protection of our intellectual property are essential principles.

### We ensure information security & data privacy

We are aware of the importance of personal data privacy and security of information trusted to us by our customers and partners. We have security awareness trainings as part of the onboarding process on a regular basis, and information security awareness exams conducted annually. Pinja processes the personal data of our employees and customers in accordance with the Personal Data Act and GDPR regulation.



#### What does it mean for me?

- Collect and use data only with the business purpose and to the extent you need to perform your work
- Follow applicable data privacy laws and regulations in the countries you are operating and follow Pinja's security policy and security guides
- Be aware of phishing: think before you click!

### We protect our intellectual property

We are committed to protecting our intellectual property. The intellectual property includes registered rights such as patents, trademarks and unregistered rights such as copyrights and knowhow. Pinja's intellectual property should be used only to the extent relevant for performing work tasks.



#### What does it mean for me?

- Follow NDA in all aspects (customer, supplier, Pinja)
- Do not copy information that belongs to third party
- If notice that rights are violated bring this information to the management's attention immediately

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

### Responsible Business Conduct

- ESG Policy
- Code of Conduct
- Social Media Policy
- Whistleblowing Policy
- Anti-corruption Policy
- Anti-trust Policy
- Diversity & Anti-discrimination Policy
- Health and Safety Policy

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

- **UN Sustainable Development Goals (SDGs)** - collection of 17 global sustainability goals
- **UN Global Compact** - principle-based framework that addresses ethical business conduct
- **OECD Guidelines for Multinational Enterprises** - recommendations addressed to multinational enterprises, that provide principles and standards for responsible business conduct

### Security and Data Privacy

- Information Security Policy
- Data Protection Policy

### Customers and Supply Chain

- Responsible Trading Instructions
- Supplier Code of Conduct

- **United Nations Convention against Corruption** - universally accepted anti-corruption instrument
- **ILO International Labour Standards** - standards that set basic principles and rights at work
- **The Universal Declaration of Human Rights** - an internationally accepted standard that sets fundamental human rights to be universally protected



