

DESTIA'S ETHICAL GUIDELINES

We strive to connect life in cities and between them in Finland and in Northern Europe. We connect communities and ecosystems. We build Destia's success on corporate culture and people. Our strong, shared values base guides our behaviour and decision-making.

These ethical guidelines describe the ethical operating principles as well as their implementation and monitoring followed in Destia Group. The ethical guidelines foster certainty in the continuity and reliability of operations and serve as a shared basis for decision-making and operations. Destia is committed to the UN Global Compact (UNGC) initiative's ten principles related to human rights, labour legislation, the environment and anticorruption.

BUSINESS PRINCIPLES

Destia's operations hinge on profitability and competitiveness. Only financially responsible business can maintain responsibility and high ethical standards in other operations.

Destia employees comply with the legislation and regulations in force and the agreements that bind the Group. We require our cooperation partners to do likewise.

We act fairly and in accordance with the principles of fair competition. We do not engage in unethical trading. We honour our contracts and commitments. We expect our cooperation partners to do the same.

Our operations are founded on the requirements and expectations of our customers, which also guide the development of our services. We assess our customers' views on our performance and improve our operations.

We honour the contracts we make with subcontractors and partners and tre-

at them fairly. Destia requires that all its contracting parties comply with Destia's ethical guidelines for contracting parties publication (Supplier Code of Conduct). We respect our competitors, even when we lose.

We make our business decisions with Destia's best interests in mind. No one is permitted to seek personal gains at the expense of the company or its competitive position.

Our operations have a significant impact on the living environment. Environmental compliance comprises an integral aspect of Destia's responsible operations and reputation. We comply with the environmental legislation and regulations in force and we take the environmental impacts of our operations into account. Our operations are guided by Destia's environmental policy and its supplementary guidelines. Reducing environmental damage is one of the key objectives in our operations.

Destia employees neither give nor accept gifts, trips, entertainment or services in excess of customary hospitality. Destia's hospitality is never unduly lavish.

Destia does not support political or religious organisations. That said, participation in social issues is the personal right of every Destia employee; however, employees must take regulations on conflicts of interest into account.

Communications are part of all of Destia's operations. Our communications are open, truthful and prompt. We inform our personnel of matters that concern them – including difficult decisions – openly, truthfully and promptly. We have a favourable attitude to contacts by the media. We are prepared to publicly discuss all matters concerning Destia, taking into account trade secrets and the specified communications responsibilities.

EMPLOYER AND EMPLOYEE PRINCIPLES

Destia honours the basic rights of employees and the collective bargaining and other agreements that bind Destia. It is the personal right of every Destia employee to be involved in professional organisations.

In Destia, everyone is treated equally, fairly and with respect. No one is allowed, without an acceptable justification, to be placed in a different position based on their gender, sexual orientation, age, origin, language, religion, conviction or any other personal reason, or a reason that is against the law. Evaluations are based on performance. Persons are selected for duties on the basis of suitability, experience and training. The relationship between the employer and employee is based on mutual respect and trust. In questions concerning employment relationships and their financial benefits, we comply with the set instructions. The "one person above" principle is upheld in the decision-making hierarchy – the decision is made by the supervisor's supervisor.

We value the professional skills of our personnel. We want to utilise our skills and pass on our competence to other Destia employees.

Destia supervisors are responsible for ensuring that all work issues are discussed openly, directly and constructively. All Destia employees are obligated to participate in discussions. Supervisors set a good example in how to work responsibly. They immediately intervene when shortcomings need to be addressed.

Destia seeks to ensure safe and healthy working conditions. By acting responsibly, the employer and employees can prevent accidents at work and health risks. We continuously develop working conditions. At Destia, we also respect the balance of work and leisure time of our employees.

Each Destia employee is responsible

for his or her own decisions and activities as well as working efficiently and safely in accordance with Destia's interests. We work together with our contracting parties and stakeholders, and we treat them fairly and openly. We are worthy of the trust shown in us. We are all responsible for creating and maintaining a good workplace atmosphere.

Each Destia employee is responsible for the appropriate use of the company assets entrusted to him or her and protecting them against harm, loss or misuse.

IMPLEMENTING AND MONITORING THE ETHICAL GUIDELINES

Compliance with the ethical guidelines concerns all personnel. Monitoring compliance is part of day-to-day operations. Deliberate violation of the guidelines may in the most severe cases lead to the termination of employment.

Any employee who observes deviations from the guidelines must inform a supervisor or submit a report as instructed. In uncertain situations, the employee must ask a supervisor about the Group's approved course of action or submit a report in the whistleblowing channel. Every Destia employee is obligated to notify any clear cases of misconduct to a supervisor or submit a report to the whistleblowing channel.

Every supervisor is responsible for ensuring that employees and cooperation partners know the content of the guidelines and the compliance requirements. Knowledge of the ethical guidelines must be included in orientation and performance management.

Destia reports on compliance with the ethical guidelines and its corporate responsibility in its annual report. ●

DESTIA

A COLAS COMPANY