



DIGIA PLC - CODE OF CONDUCT

1 FOREWORD

1.1 Our values and purpose of this policy

At Digia we support and respect international standards on human rights, labour conditions, antibribery and environment, and conduct our business in accordance with the respective international and regional initiatives. We are highly committed to integrity and sustainability in all our business and recognize the topics stated in this policy as some of our key values.

The purpose of this policy is to state the main rules and guidelines that we at Digia follow and require that all our employees, subcontractors and other partners follow as well. This policy is made publicly available for anyone to read.

2 OUR GENERAL PRINCIPLES

2.1 Lawfulness of operations

We at Digia always ensure that our day-to-day business operations and actions abide by laws, decrees and other official guidance applicable to us. We educate and inform our staff, subcontractors and other partners on applicable legal requirements and aim to ensure that we always stay on top of the requirements of the current legal framework. We do not tolerate any illegal activity or actions, and always require our subcontractors and partners to adhere to similar way of working.

2.2 Transparent communication

As Digia is a publicly traded company, we have an obligation to comply with laws governing public communications. We always strive for transparency in our communications with parties involved and ensure that only true and reliable information is disclosed or communicated. We publish accurate and up-to-date information concerning Digia's current status in order to avoid misleading our customers, partners, investors or the general public in any way.

3 ETHICAL BUSINESS PRACTISES

3.1 Antibribery and hospitality

We at Digia do not allow bribery or corruption in any forms. We conduct our business in an ethical manner. We refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers, government officials and any other party are in compliance with applicable anti-bribery laws. We ensure that all our subcontractors and other partners are aware of our zero tolerance to all forms of corruption and require that they adhere to equivalent obligations.

We do not request or accept any financial or other advantages that we suspect being offered with expectation or intention that it will provide or retain a business advantage for anyone else in return,

nor do we accept or offer anything of value to or from government officials. We instruct our employees to only accept modest gifts or hospitality, and never to accept any gifts or hospitality if such arrangements could affect the outcome of business practices. Further, we educate our employees on antibribery and anticorruption measures and maintain internal antibribery guidelines.

3.2 Fair competition

Hera at Digia we always compete in a fair and professional manner. We respect applicable competition laws in all our dealings with competitors, customers, suppliers and other partners. We refrain from making any arrangements that might endanger fairness of competition, such as illegal agreements between competitors aiming to fix prices or promote other unfair trade practices.

3.3 Accurate books and records

We ensure that our financial records accurately reflect our transactions and financial conditions of the company in accordance with applicable laws and regulations. We require that all our employees declare and keep accurate record of all expenditures related to prospective and current customers. All agreements, invoices and receipts relating to such expenditure must be submitted, accepted and recorded in accordance with our internal policies and guidelines. Accounts that conceal the source or nature of the expenditure are strictly prohibited.

3.4 Third party rights

We honor and respect third party rights such as those are defined in patents, user rights, trademarks and any other intellectual property rights, and require our subcontractors and other partners to do the same.

3.5 Environment

We care for the environment and strive for sustainable choices in procurement. We encourage environmentally friendly solutions both in our business and in our working environment, expecting our subcontractors and partners to do the same.

4 HUMAN RIGHTS AND EMPLOYER RESPONSIBILITIES

4.1 Non-discrimination and equality

We treat all our employees equally, regardless of ethnic origin, religion, age, nationality, gender, disability, civil status, sexual orientation or political status. We treat all our employees with utmost respect and do not allow discrimination of any form. We provide equal opportunities for all our employees to self-development, further education and training, benefits and advancement in their career based on their interests, performance and abilities.

4.2 Fair working conditions

At Digia we ensure that our employment contracts and terms are understandable to all employees and that details of employment contracts are made known to every employee prior to them entering into them. We ensure that our employees are paid fairly and that payment terms always comply at least with applicable laws or industry standards, which ever higher. We do not allow child labour and always comply with minimum age laws. Our employees' freedom to organize and to be represented by trade unions is respected and no disciplinary action is taken against employees choosing to organize. We do not allow any form of forced labour and our employees are always free to leave after the due notice period stated in their employment contract.

4.3 Health and safety

We care for the wellbeing of our employees. We make sure that we provide a safe and healthy workplace for all our employees. We do not tolerate abuse, offensive behavior or harassment of any nature. Where possible, employees are offered flexible working conditions in order to better promote a healthy work-life balance.

5 SECURITY OF INFORMATION AND DATA

5.1 Information security and confidentiality

We protect the security of all information, materials, and equipment in our possession, whether our own, our customers' or our partners'. We ensure that appropriate security measures are in place to guarantee safety of all information and data we have access to. Our security measures implemented are regularly reviewed and assessed. Insider information and other non-public information is kept strictly confidential and our employees are instructed on such confidentiality. Any misuse of insider information or non-public information is strictly prohibited.

5.2 Privacy

We protect the personal data of our employees, customers, subcontractors and other partners. We comply with privacy laws and regulations when personal data is collected, stored, processed, transmitted or shared. We process any and all personal data that we have access to responsibly and carefully. We maintain appropriate information concerning the data processing performed by us and update our internal privacy measures and policies regularly. We ensure that we have appointed qualified personnel to monitor our internal privacy practices.

6 INSPECTIONS AND REPORTING

In order to ensure compliance with this policy, we report all incidents or suspected malpractices or violations concerning the matters stated in this policy. We encourage our employees, subcontractors and other partners to report any suspected violation and, where necessary, provide necessary

supportive documentation. Where necessary, we may conduct an audit to determine if any violation has taken place. All reports and notifications are handled confidentially. We do not allow retaliation or any negative action against a person making such report in good faith.

In practice you may report an incident or suspected incident via the misconduct reporting template available at [Digia's website](#) or [Digia Intranet](#).