



Approved by the
SGN Group Board,
May 2025

SGN GROUP OY - THE WAY WE OPERATE

ETHICAL PRINCIPLES FOR PERSONNEL

The ethical principles of the SGN Group guide our daily business operations in all the countries where we operate. These principles reflect the SGN Group's values, as well as generally accepted standards of conduct and guidelines. The principles apply to all employees of the SGN Group and its subsidiaries, as well as to the SGN Group's Board of Directors.

Responsible business has always been one of our core values, rooted in the valuable principles of our company's founder, Sven G. Nieminen. It has supported the company and guided our personnel for decades in making the right and sustainable decisions. The values that are embedded in the foundation of our operations – customer focus, continuity, and respect for personnel – have provided us with a framework for developing our companies over the years.

1.We operate with equality, fairness, and respect

We treat all people equally, fairly, and with respect. To us, everyone is of equal value, and we do not discriminate against anyone based on age, nationality, religion, gender, state of health, sexual orientation, family status, or any other personal characteristic.

We do not accept any form of inappropriate behavior or speech directed at colleagues or business partners, under any circumstances.

We conduct our business with respect for human rights, in accordance with the UN Guiding Principles on Business and Human Rights and the conventions of the International Labour Organization (ILO). We do not tolerate child labor, forced labor, or any other violations of human rights.

2.We prioritize safety and well-being in the workplace

Workplace safety and employee well-being are very important to us. Our goal is to ensure that the work environment and conditions are safe and pleasant, and that our tools and equipment are modern, ergonomic, and functional. As employees, we take responsibility for our own and colleagues' safety by following workplace safety guidelines and practices, and by reporting security observations.





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3. We train and develop our personnel

All our employees, regardless of age, have equal opportunities for training. Courage and curiosity come from within us. When someone has the desire to grow, we encourage learning new skills and find new challenges for those who are willing.

We expect our leaders and supervisors to act fairly, transparently, and responsibly. We continuously train our supervisors, for example, in coaching leadership.

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4. We avoid conflicts of interest – bribery and corruption are prohibited

All business decisions must be based on what is objectively in the best interest of our company. Conflicts of interest may arise if personal interests, relationships, or other factors

We do not accept or give bribes. For example, gift cards, trips, or gifts that could affect impartiality must always be disclosed and approved by a supervisor.

5. We act honestly, confidentially, and responsibly

We comply with applicable laws, regulations, guidelines, and SGN Group's policies.

Our personnel handle all information concerning the organization, customers, and partners confidentially. We respect data protection and privacy in all our operations.

We comply with the GDPR regulation and other applicable data protection laws. We ensure that our personnel receive regular training on data protection policies.

If an employee observes unethical behavior, legal violations, or other concerns, they are obligated to report the matter to their supervisor, HR, the occupational safety representative, or via the intranet feedback channel. Reports are always handled confidentially and without fear of retaliation against the reporter.

