

A photograph of three people in a modern office environment. A man with glasses and a beard is on the left, smiling and looking at a laptop. A woman with glasses is on the right, also smiling and looking at the laptop. A third person, a woman with blonde hair, is in the background, also smiling. The office has large windows and modern lighting.

SPONDA

Code of Conduct

Approved by the Executive Board on 22.3.2021 / Effective date: 22.3.2021



The Code of Conduct is based on our values

WHAT

Our roots lay firmly in our values: people first, succeed together, customer success, ownership and continuous learning. These values have been defined by working closely with the Sponda employees and listening to what they consider the most important themes at a workplace. The Code of Conduct reflects these values and provides ethical guidelines to our employees on how to conduct themselves in the workplace.

WHY

Our vision is to be the leading real estate asset management company in Finland. We strive to create value for our stakeholders by amplifying our customers' and business partner's ability to succeed, creating spaces where communities can thrive sustainably and by serving our investors by delivering risk-adjusted returns.

We are committed to the ten globally accepted responsibility principles of the UN Global Compact, which are related to human rights, labor, environment and anti-corruption. We are also committed to the Sustainable Development Goals of the United Nations (2030 Agenda), which are in line with our aims of sustainable development and continuous improvement.

We seek to outperform our competitors through fair and honest means, and we look for competitive advantages through superior performance - never through unethical or illegal business practices. We plan and evaluate our activities from economic, social and environmental responsibility perspectives and we conduct our business transparently, complying with legislation and regulations at all times.

HOW

Every employee is required to familiarize themselves with The Code of Conduct as a part of the New Employee Introduction package. Regular refresher sessions are arranged for all employees and new updates are communicated promptly to the whole staff.

This Code of Conduct has been approved by Sponda Ltd's Executive Board on xx of October 2020. For our business partners, we have also created a separate Code of Business Conduct following the same principles as our general Code of Conduct. We expect our partners to honor and conduct their business accordingly.

FOR WHOM

This policy applies to **everyone at Sponda**.



The Code of Conduct applies to all our operations

- This Code of Conduct applies to all our operations and it guides our day-to-day work.
- All employees are required to read and commit to this Code of Conduct.
- The company shall ensure that its employees are aware of the significance of the Code of Conduct and familiar with its content.
- To ensure that these guidelines penetrate our working culture, we participate in annual training to familiarize ourselves with their content. Code of Conduct training is also a required part of the new employee introduction training.
- The Code of Conduct is available also on our intranet and website.

How the policy should be used?

- All employees are responsible for acting in accordance with this Code of Conduct.
- The Code of Conduct is meant to act as support and reference in cases of doubt.
- We do not condone illegal or unethical practices and we encourage our personnel to report any misconduct.
- All notifications are taken seriously and handled according to the Whistleblowing Policy.
- For instructions on how to report an issue, please speak to your superior or contact person, or refer to the Whistleblowing Policy.



Our commitments



COMPLIANCE WITH LAWS

We comply with applicable laws and regulations.



SAFETY, SECURITY AND CONVENIENCE

The health and safety of our properties are our key priorities.



PROTECTING OUR BRAND

We strive to be the leading real estate asset management company in Finland.



PROTECTING THE ENVIRONMENT

Environmental responsibility is an integral part of our strategy and day-to-day operations.



HUMAN RIGHTS

People are at the heart of our business. We are committed to respect and promote human rights throughout our operations.



BE FAIR, SMART AND RELIABLE

We believe in being the best by our own merits. Bribery, money laundering and other illegal or unethical practices are prohibited in any situation or form.



HEALTH AND WELLBEING

We take the responsibility to ensure that our employees and stakeholders feel safe and respected.



INFORMATION SECURITY MATTERS

Information is valuable and vulnerable. We manage and protect it to the best of our ability.

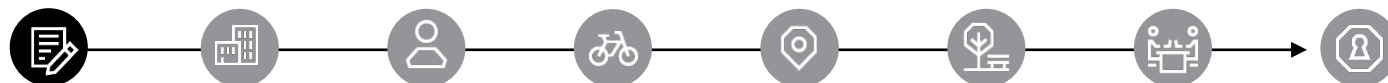
Compliance with laws

We know and follow the law. We also respect and comply with the UN Global Compact and its commitments.

We carry out our business transparently, complying with applicable legislation and regulations.

We take the time and effort to expand our knowledge and expertise on applicable legislation and regulations that concern our line of business.

We are committed to the UN Global Compact **and communicate** our corporate responsibility achievements to our stakeholders annually in accordance with the GRI framework and fulfilling the reporting requirements of the UN Global Compact.





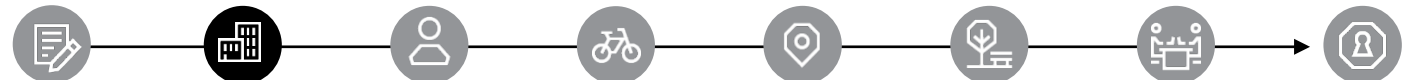
Protecting our brand

We strive to be the leading real estate asset management company in Finland.

We build our brand on the basis of our values, vision and strategy. Our vision is to be the leading real estate asset management company in Finland. The core of our brand is to create the space to shine for our employees, tenants, partners and public institutions. Value derives from creating unrivalled experiences and going the extra mile for our customers, while maintaining environmental responsibility in all our operations.

We remember, that whenever we interact with customers, other stakeholders or with each other, our brand image is influenced by our conduct. We pursue open, direct and respectful communication.

We understand the importance of Intellectual Property Rights and take care that our brands are protected. We take care that our brands are not mistreated or falsely used.



Human rights

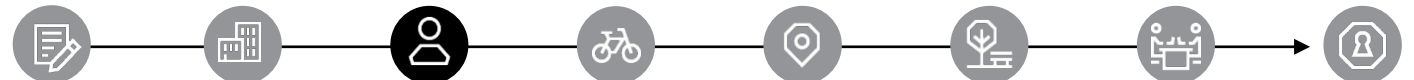
People are at the heart of our business. We are committed to respect, protect and promote all internationally recognized human rights throughout our operations.

We understand that we are all different and we **respect diversity**. **We treat everyone equally**. Equality and non-discrimination are key priorities in our business. Our objective is that employees experience zero discrimination or unequal treatment, irrespective of gender, age, religion, health, sexual orientation or other such factors.

We respect the freedom of association in the workplace and the right to form and join workers' organizations of our choice.

We support and promote the International Bill of Human Rights and the principles concerning fundamental rights set out in the ILO's Declaration on Fundamental Principles and Rights at Work.

We condemn the use of child labor, or any other form of forced labor and other human rights violations.



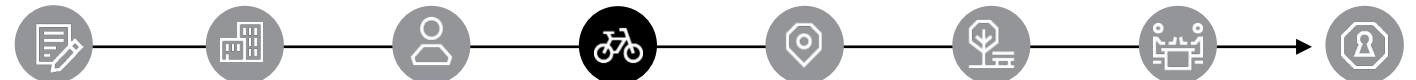
Health and wellbeing

We take the responsibility to ensure that our employees feel well, safe and respected.

To create a respectful and safe working environment, **we carefully manage** both the physical and psychosocial occupational health and safety of our employees.

We take proactive measures to ensure overall health, safety and well-being at work. Equally, our corporate culture aims to support the development of employee competence, their professional development and career longevity.

We all have the right to be heard and the responsibility to speak up. If we see or suspect that something is illegal or unethical, we voice our concerns and report our observations.

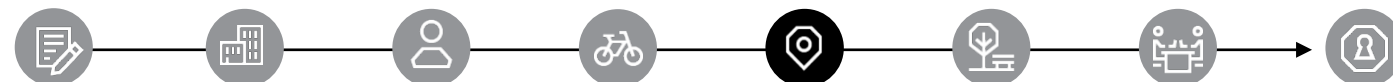


Safety, security and convenience

The health and safety of our properties are key priorities for us.

We invest in our properties to consistently develop them into secure, comfortable and enjoyable environments. Acting in this manner, we are able to provide pleasurable experiences and high satisfaction levels for our tenants, consumers and other stakeholders.

We strive for interactive partnerships with our customers to create business premises that support their operations. The central location of our properties is of strategic importance to us as it offers unrivalled accessibility and ecologically sustainable workplace solutions, permitting environmentally friendly commuting and therefore minimizing emissions.





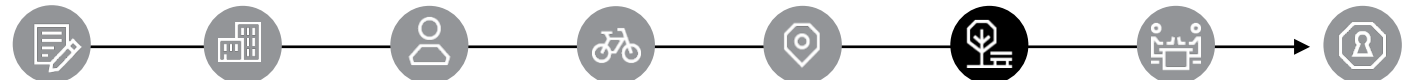
Protecting the environment

Environmental responsibility is an integral part of Sponda's strategy and day-to-day operations.

We consider environmental responsibility to be one of our strategic focal points and we regularly assess the risks and opportunities related to environmental matters. Profitable business is supported by the principles of sustainable development in everything we do, including the design, energy efficiency, construction, maintenance, repair and use of properties throughout their life cycle.

We are committed to reducing both energy and water consumption together with carbon dioxide emissions, as well as increasing waste recycling and reuse rate.

We collaborate with our customers to reduce the environmental impacts from the use of our properties. In addition, our property development projects are implemented in accordance with international environmental certification systems.





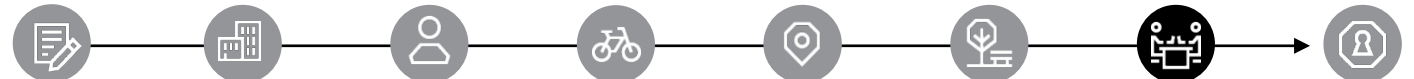
Be fair, smart and reliable

We believe in being the best by our own merits. Bribery money laundering and other illegal or unethical practices are prohibited in any situation or form.

We promote responsible operating practices in the property sector in co-operation with our partners aiming for an active and open dialogue based on reliability and integrity. A trustworthy company is a trustworthy partner. By playing fair and smart, **we aim** to be the best by our own merits, adhering to the highest legal and ethical standards in all our actions.

We prohibit and condemn all forms of money laundering and corruption, including extortion and bribery. Acting or advising to operate in that manner is unacceptable in all situations. Our daily work **systematically and actively acts** against corruption and is in alignment with the legislation that regulates companies operating within the European Union.

We are permitted to either offer or accept moderate gifts or tokens of appreciation, provided these are given openly and sincerely. The guideline value of such a gift is a maximum of EUR100 biannually per vendor, but the use of good judgement is advised. **We understand and ensure** that receiving a gift, meal or invitation to an event must not jeopardize the integrity of any decision-making process.





Information security matters

Information is valuable and vulnerable. We manage and protect it to the best of our ability.

We recognize not only the possibilities but also the risks presented by the digital environment and strive to take all precautions to protect our personal and business data. With information being a crucial asset, it is imperative to treat it accordingly.

We respect the privacy of individuals and partners in all of our business activities. We collect and process personal data only when we have a legitimate and specific purpose for it.

We comply with all applicable data privacy laws and regulations and will report all misconduct and privacy or data security breaches accordingly.

