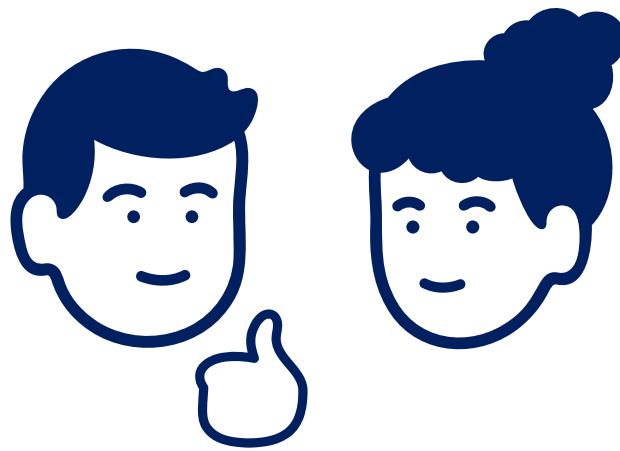


FRENDY

Frendy's Code of Conduct



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Greetings from the CEO

At Frendy, we believe that success in business and responsibility go hand in hand. For us, good business means responsibility.

Frendy's Code of Conduct is the foundation of our responsible and ethical operations. This Code of Conduct paves the way for everything we do in the name of Frendy, touching all Frendies, regardless of position, job description, time and place. We also expect responsible and ethical practices from our partners.


Frendy exists so that a successful company does not have to be an IT expert. We Frendies act and make everyday decisions so that, step by step, we are closer to our goal of being the number one choice for customers and staff, and the largest and most profitable in terms of responsibility.

We believe that as Frendies flourish in their work, our customers will also be happy. So we treat each other with respect and support our employees to excel in their skills. We work hard to achieve our goals and do so in accordance with our values and guidelines.

We base our Code of Conduct and our business principles on the UN Global Compact, a corporate responsibility initiative launched by the UN in 2000. The UN Global Compact promotes and develops the ecological, social and economic responsibility of companies and communities using the Ten Principles of the UN Global Compact. In addition, both our Code of Conduct and the goals of our responsibility theme are strongly guided by the UN 2030 Agenda for Sustainable Development Goals created for 2016–2030, of which we aim to specifically influence 5 Gender Equality, 8 Decent Work and Economic Growth, 13 Climate Action and 16 Peace, Justice and Strong Institutions.

This Code of Conduct was approved by Frendy Holding Oy's Board of Directors on 1 March 2024. The original Code of Conduct was adopted and entered into force on 26 November 2021.

Frendy Holding Oy,



Mikko Peltonen, CEO

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Our values

Our values guide our operations both internally and externally. Acting in accordance with values creates a culture in which it is good to be and work.

Frendy is reliable

We believe that in order to be the customers' number one choice, we need to have a sufficient understanding of their business. In this way, we can support it in IT in the best possible way. We understand that trust is the foundation of all cooperation, and by strengthening that trust, getting to know each other will, step by step, turn into a lifelong friendship that both parties want to nurture. At Frendy, we show that we are worthy of trust by keeping our promises, honoring the decisions we make, and doing our work so well and responsibly that we can always be proud of it.

Frendy works together

We know that winning is a team sport. We put common goals before everything else and work together, as we know that this also works best for our own benefit. We help our friends, we learn from our friends, and we are there for our friends. We work in an exemplary and proactive way together – for the success of our customers and Frendy. We want to improve and always do things better than yesterday. We work responsibly and aim for results that are in line with the goals through a high quality of business life. At Frendy, there's no "us" and "them" – the customer is an extension of the team.

Frendy is easy-going

We Frendies believe in the power of uncomplicated, easy-going and cheerful interaction. We dare to speak out about even the most difficult things. We are not afraid of criticism, because we trust each other, and we always strive for the best for the customer and Frendy. Our disagreements are between options, not people. We talk kindly, constructively, based on facts and without undue delay.

Frendy is fair

We are confident that fair play will ultimately always lead to success without neglecting responsibility. For us, responsibility is an act between business, people and the environment that we can be proud of in the long run. We treat both new acquaintances and old friends equally, assuming that every person is born benevolent and capable. We believe that by our own behavior and being fair and responsible, we create positivity and joy around us. With them, we make Frendy an even more comfortable workplace for Frendies, a more flexible friend for our customers and a sustainable operator for our environment every day.

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Our Code of Conduct

Compliance

1. **We follow the law:** We follow the law, the principles of this Code of Conduct and good business practices in everything we do. We do not tolerate any violation of the law, and we never encourage or advise anyone (a Frendy, partners or any other party) to act in violation of the applicable law.
2. **We comply with the data protection requirements:** We process personal data in accordance with good practices and privacy policies. We respect the right to privacy of our employees and everyone else. We collect, use and store personal data only when it is appropriate due to our activities. All of us who have access to personal data are obliged to use it with caution, to protect it from unnecessary and unauthorized access, and to prevent it from falling into the wrong hands.
3. **We keep trade secrets:** We keep confidential information obtained in our work about the activities of Frendies, our customers and other parties, as well as about staff, customers and partners. We do not disclose or transfer this information to anyone other than the relevant parties.
4. **We are committed to fair competition:** We are in favor of free and fair competition. Frendy complies with competition law and does not engage in any activity that restricts or impedes competition.

Honesty

1. **We avoid conflicts of interest:** We always make decisions in the best interests of Frendy. Pursuing one's own interests or those of a friend in the performance of one's duties is unacceptable. We treat our friends and loved ones like our other partners, and our personal relationships with partners do not affect our decision-making.
2. **We do not offer or receive bribes:** Bribery in all its forms is prohibited at Frendy. We do not offer or receive bribes in favor of Frendy in decision-making of any kind or by any party. We are committed to the UN Global Compact on anti-corruption.
3. **We are reasonable in hospitality:** An employee of Frendy can only give or receive a personal gift of low value. Acceptable hospitality or gift is occasional and does not result in any open or covert obligations to the giver or recipient, nor in any expectation of return favors. An acceptable gift and hospitality is always given openly, because when a gift is of an acceptable nature, there is no need to conceal its giving or receiving.
4. **We communicate transparently and honestly, building the image of Frendy:** We always communicate transparently and honestly. With every message and action, we build the Frendy brand and a good corporate image.
5. **We look after Frendy's property:** Each of us is responsible for the proper use of Frendy's property, both intangible and tangible.

Responsibility

1. **We respect human rights:** We are committed to internationally recognized human rights in all our operations. We do not accept human rights violations in any form. We are committed to the UN Global Compact on human rights.
2. **We treat everyone equally:** We are committed to equal, non-discriminatory and fair treatment of people in all matters related to the staff. We evaluate people based on their skills and achievements. We value positivity, initiative, cooperation skills and responsible performance. We do not tolerate any form of discrimination, bullying or harassment on the

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grounds of race, ethnicity, nationality, gender, sexual orientation, marital status, religion, birth, disability, age or other subject matter. We are committed to the UN Global Compact on working life.

3. **We minimize our own environmental impact:** We comply with laws to protect the environment. In our business decisions, we always strive for environmentally sustainable solutions – be it for the services we provide, supplier choices, the transition to renewable energy, waste sorting or travel. We are committed to the UN Global Compact on environmental matters.
4. **We help our customers to minimize their environmental impact through IT:** Frendy's core competencies include enabling and enhancing customers' knowledge work, and with these measures, we aim to make an impact in society in order to reduce the carbon footprint. Concrete examples of this are the decrease in travel thanks to time- and place-independent functional knowledge work, as well as our services aimed at the life-cycle management of IT equipment.

Compliance with the Code of Conduct and reporting

It is the responsibility of each and every Frendy employee, regardless of their position or job description, to familiarize themselves with and act in accordance with these Code of Conduct. In unclear situations or other related questions, you are advised to contact the head of your own business unit, the HR and ESG director or the CEO. By building together an understanding of our Code of Conduct and how it will be implemented in practice, we will create an even better workplace for our staff and a service provider for our customers.

This Code of Conduct is owned by the Frendy Management Team. The Code of Conduct is reviewed if necessary and any updates require the approval of the Board of Directors of Frendy.

It is the responsibility of each manager at Frendy to put this Code of Conduct into practice on a daily basis and to monitor compliance with the Code of Conduct. Any operation that does not comply with the operating instructions must be stopped immediately and repaired without delay. Failure to comply with the Code of Conduct can be reported anonymously in a [whistleblower report](#) or directly to a supervisor, OHS, a shop steward or the HR and ESG Director.