

Evli Plc Supplier Code of Conduct

Responsibility is at the core of the operations, values and strategy of Evli Plc and its Group companies ("the Group" or "we"). Our values are entrepreneurial spirit, good relationships, honesty and continuous learning. As a listed company in the financial sector, we are bound by national and multinational regulations and our activities are supervised by the Financial Supervisory Authority. As a responsible pioneer in our industry, we are also voluntarily committed to operating in a way that is sustainable regarding the environment, society and good governance. Such initiatives to which we are committed include the Carbon Disclosure Project (CDP), Finsif, and the Principles for Responsible Investment (PRI), developed in cooperation with the UN.

We expect responsible business conduct from our own employees and from our partners (including suppliers, subcontractors and service providers). This document describes the key areas of responsible business conduct and the related Code of Conduct to which Evli Plc and its Group companies are committed and to which we expect all our partners to commit in their operations. The conditions set for the activities of our partners also apply to any subcontractors they may use.

Actions that are in violation of the Code of Conduct may result in the termination of the cooperation between Evli Group and the partner in question. Such actions may also, under the conditions set out in the agreement between Evli Group and the partner, lead to contract law sanctions, such as a contractual fine or damages.

HONESTY, OPENNESS AND COMPLIANCE WITH THE LAW

Compliance with the law in all activities

We and our partners must comply with applicable national and multinational regulations, subordinate regulations and instructions from regulatory authorities. Where the principles described in this Code of Conduct go beyond the requirements of applicable laws and regulations, the partner must comply with the requirements described in this Code of Conduct.

Good governance

In addition to the minimum obligations imposed by legislation such as the Limited Liability Companies Act (624/2006), as a listed company we are committed to complying with the Corporate Governance Code for listed companies and the rules of Nasdaq Helsinki Ltd (Helsinki Stock Exchange). We also require our partners to comply with good corporate governance as required by the applicable legislation and industry guidelines.

Reporting violations

If a representative of our partner suspects or witnesses activities that breach this Code of Conduct, they must report them to our contact person or anonymously through the Evli whistle blowing system, which can be found at www.evli.com. Our employees are committed to reporting all violations of this Code of Conduct through Evli Group's anonymous whistle blowing system.

FAIRNESS AND ETHICS

Prevention of corruption

Under no circumstances may we or our partners promise or pay a bribe or encourage anyone to take or give a bribe. Other illegal or unethical practices, such as extortion, money laundering and corruption, or the encouragement of such practices, are also prohibited in all activities.

A partner shall not offer Evli Group employees travel, social events, gifts or other benefits that are not reasonable and clearly related to the work and that may have an improper effect on the business relationship.

Fair competition

Neither we nor our partners shall engage in any activity that restricts or inhibits fair competition. We require our employees and partners to comply with competition law and to be familiar with the competition law guidelines relevant to their activities. The partner must have adequate policies and procedures in place to ensure that its management and employees do not engage in anti-competitive activities.

Related party transactions

We and our partners make sure that when doing business with a related party, possible conflicts of interest are properly taken into account in decision-making and that decisions are made on a market basis and on regular commercial terms.

Policy on gifts

Evli Group has policies on giving, receiving and representing gifts. An employee of the company or member of the company's management must not accept or give any gifts or benefits that are or could be inconsistent with the best interests of the company or its clients, or otherwise provide any undue advantage to the person receiving or giving the gift, or to any third party. Our partners must not give or accept any gifts or benefits mentioned above from Evli Group's employees or members of the company's management.

Money laundering, sanctions and grey economy prevention

Evli Group has policies on the prevention of money laundering and the financing of terrorism, which it follows in all its activities. Evli must identify and know its clients and business partners in the manner required by law. If Evli cannot verify the origin of its clients' funds or the compliance of its partners' transactions with the law or good practice, Evli cannot enter into a client relationship or cooperation. Evli complies with binding sanctions legislation and monitors the activities of its business partners to avoid doing business with entities on binding sanctions lists. Evli combats the grey economy and does not permit or support any form of grey economy activity in its own operations.

Our business partners must comply with the applicable money laundering laws and regulations, as well as any sanctions applicable to their own activities. Our partners must be committed to the fight against the grey economy and act in all circumstances in accordance with the Act on the Contractor's Obligations and Liability when Work is Contracted Out.

HUMAN RIGHTS AND TREATMENT OF EMPLOYEES

Respect for human rights

We respect and promote internationally recognised human rights, such as the UN's Universal Declaration of Human Rights and the ILO's eight core conventions of fundamental human rights, in all our activities, and we require our partners to do the same. Our partners must ensure that they are not complicit in human rights abuses. Evli Group and its partners must

support, in their own activities, the effective elimination of all forms of forced labour and child labour.

Prevention of workforce exploitation and discrimination

All workers must be treated equally and with respect to the value of the individual, regardless of gender, age, religion, state of health or other similar factors. Discrimination or harassment is strictly prohibited. Evli Group and its partners must support, with their own actions, the elimination of discrimination in the labour market and in the context of professional practice.

Equality

Evli Group has drawn up an equality and non-discrimination plan, which includes measures to promote equality and non-discrimination and an agreement on their monitoring. We have representatives of both genders on our Board of Directors and management team and offer equal opportunities for career development and advancement to all our employees.

We also require our partners to take action to promote equality and equitable treatment, and to offer all their employees equal career development and advancement opportunities.

Combining work, family and free time

We believe that supporting and enabling the reconciliation of work, family and personal time is a cornerstone of our corporate culture. Our employees have the opportunity to take advantage of all statutory family leaves and, depending on their own family situation, to adjust their working hours to part-time work, for example. Reconciling work and family life with other personal time should not be an obstacle to career development or advancement opportunities. Our partners must also take steps to support their employees in balancing work, family and free time.

Occupational safety, Working Time Regulations and statutory payments

All employees of Evli Group and its partners must be provided with safe working conditions and guaranteed adequate insurance coverage, occupational health care, and the pension insurance and other payments required by law. Ensuring safe working conditions means not only safe working premises but also, for example, that the workload of employees must be at an acceptable and sustainable level. Evli Group complies with the Working Time Regulations in its operations, and we require the same of our partners. Overtime must be compensated in accordance with the Working Time Regulations and any applicable collective agreement.

Remuneration

Evli Group follows the special regulations for the financial sector in the area of remuneration. The objective of remuneration is to support the achievement of the Group's strategic objectives, growth and financial success in the long term and to commit employees to act in accordance with the Group's objectives. The remuneration systems are designed to be consistent with and promote good and effective risk management. We require our partners to ensure that their remuneration practices are in line with regulatory requirements.

Freedom of association

Evli Group and its partners must uphold freedom of association and the effective recognition of the right to collective bargaining. Employees must have the right to organise and, in the manner permitted by applicable labour law, to elect a trustee and a health and safety representative from among themselves.

ENVIRONMENTAL PROTECTION

Environmentally friendly solutions and technologies

The environmental efficiency of the properties owned by Evli Group's funds is improved by implementing environmentally friendly solutions in the construction, development and maintenance of the properties. Evli Group's real estate funds are committed to the principles of responsible investment, which are available on the Evli website

https://www.evli.com/hubfs/Evli.com/Documents/Responsibility/EN/Real-Estate-Funds-Principles-for-Responsible-Investment_acc.pdf

We require our partners to comply with laws, guidelines and directives relating to environmental protection and to ensure that appropriate permits and permit conditions are met. Our partners must monitor the energy consumption of their properties and, where possible, invest in environmentally friendly forms of energy.

Reducing environmental impacts

Evli Group's own operations do not cause any significant direct environmental impacts, and our energy use is mainly related to energy consumption in our premises. Evli Group's most significant environmental impacts arise indirectly through its investment activities. However, we recognise that our own activities can contribute to positive environmental impacts, for example by reducing paper consumption, developing digital services, reducing air travel and energy consumption, and procuring lower-emission electricity.

We also require our partners to take environmental impacts into account in all their activities and decision-making. Negative environmental impacts of operations must be identified and managed. The partner must repair and compensate for any environmental damage caused by its activities.

INFORMATION SECURITY AND TRUST

Keeping business secrets confidential

Partners and their employees must keep confidential information they receive a secret. This information should not be disclosed or divulged to anyone other than the parties concerned or the authorities. Evli Group and each of its employees are bound by banking and insurance secrecy.

Ensuring the confidentiality of personal information

The Evli Group pays particular attention to data protection and the protection of the privacy of its clients in its operations and in the processing of personal data. We process the personal data of clients in compliance with the General Data Protection Regulation, legislation on investment services, auxiliary services, and insurance mediation and special legislation, and ensure that privacy protection and confidentiality obligations are followed when processing personal data.

We also require our partners to comply with the applicable data protection regulation, such as the EU General Data Protection Regulation, as well as with good personal data processing practices and data protection standards. Only personal data that is strictly necessary must be collected and registered.

IMPLEMENTATION

By entering into an agreement with Evli Plc or one of its group companies or entities, the partner agrees to comply with this Code of Conduct and the instructions and regulations issued by Evli Plc on the basis of this Code. The partner must ensure that the principles are also complied with by any subcontractors of the partner.