

## ETHICAL GUIDELINES FOR PERSONNEL

Consti Oyj and its subsidiaries (hereinafter "Consti" ) are responsibly operating construction companies. Consti strives for high ethical standards in all of its operations. Responsible and ethically sustainable mode of operation is integral to Consti's risk management and creates the foundation for sustainable long-term development.

All of Consti's operations must adhere to existing legislation and Consti's guidelines on good Corporate Governance. These ethical guidelines are based on the Corporate Governance guidelines currently in effect at Consti.

The following section contains concrete perspectives related to Consti's operations and guidelines for ethical action.

### 1 PREVENTION OF BRIBERY AND CORRUPTION

Under any conditions, Consti or its staff may not give or receive gifts, payments, or other benefits or compensations that go beyond regular hospitality and could be assumed to influence business decisions.

With regard to the prevention of bribery and corruption, Consti must conduct all of its operations in accordance with existing legislation and its own **anti-corruption guidelines**, which are part of Consti's Corporate Governance guidelines.

### 2 BUSINESS TRIPS, REPRESENTATION AND ENTERTAINMENT

Staff members may only participate in the business trips of partners if they are work-related. These trips are to be agreed upon beforehand with the supervisor and the possible ambiguities must also be discussed. The trip must have an itinerary that is presented to the supervisor.

Giving or receiving regular business gifts and hospitality in conjunction with business operations is permitted, provided that they are offered transparently and are proportionate to the recipient's position and status.

Gifts and hospitality must be offered and received sincerely and in Consti's name. Their value must not exceed 150 euros. If the value of a gift exceeds 150 euros, the giver or recipient of the gift must ask their supervisor in advance for written approval to give or receive it.

With regard to business trips, representation and entertainment, **anti-corruption guidelines** in effect at the time must be adhered to.

### 3 EMPLOYEE DISCOUNTS

The employee discounts of Consti's suppliers may only be used by Consti personnel for personal purchases by agreement between Consti and the supplier. Agreed upon practices, such as resale bans, are to be adhered to when taking advantage of these discounts. The use of the discounts must not result in the formation of any kind of reciprocal commitments.

With regard to employee discounts, **anti-corruption guidelines** in effect at the time must be adhered to.

### 4 CHARITY

Consti primarily supports organisations that promote the well-being of children and youths. Aid is not given to political parties, groups or individual politicians.

The provision of aid must adhere to **anti-corruption guidelines** in effect at the time.

### 5 COMPETITION LEGISLATION

Consti adheres to fair and open competition. Actions that go against the letter or spirit of competition legislation are prohibited. Such actions include illegal price fixing, market sharing and unethical trading. Competition legislation is also adhered to when operating in the industry's cooperative organisations.

Consti's operations must adhere to Consti's **competition guidelines**, which are part of the company's Corporate Governance guidelines.

### 6 EQUAL TREATMENT

Personnel are treated equally regardless of their sex, age, sexual orientation, religious conviction or origin.

The same principle also applies to customers and other stakeholder groups.

### 7 PARTNERSHIPS AND ACQUISITIONS

Stakeholder cooperation adheres to the principles of honest and open operations. Consti only chooses the best operators in the field as its contractual partners and cooperates with them in the development of operation models. Consti also strives to achieve a deeper business relationship with its partners in order to ensure the best possible price level, service level and availability.

When there is no partnership or seasonal contract in place, all significant acquisitions, deliveries, work tasks and services are put out to tender openly and honestly among an adequate number of operators. Acquisitions always require written agreements.

## 8 CONFLICTS OF INTEREST

Consti employees will not act in a way that results in a situation where their own personal or financial interests are in conflict with those of Consti, Consti's customers or Consti's staff.

When conducting their responsibilities and making business decisions (such as approving invoices or entering into agreements), Consti employees must only consider the interest of Consti regardless of their possible personal interest in the matter, or the possible interest of their immediate circle or some other stakeholder group. Consti employees have no right to participate in making decisions that concern their own personal interest or the interest of their immediate circle or other such stakeholder group. This ban concerns such actions as approving invoices and entering into agreements.

Consti employees must avoid situations and conditions that might result in a conflict of interest. If such a situation were to arise, employees must notify their supervisor and branch director of the matter immediately.

Regarding conflicts of interest, personnel must adhere to **anti-corruption guidelines** in effect at the time.

## 9 CONFIDENTIALITY OBLIGATION

Consti personnel commit to keeping secret and not making use of the trade and business secrets of their employer, its employees or its clients during or after their employment relationship in accordance with their non-disclosure agreement.

## 10 REPORTING CHANNEL

If a person employed by Consti observes actions or behaviour that are in breach of these guidelines, they must notify their supervisor or the supervisor of their supervisor of the matter. This report may also be submitted according to the instructions concerning the whistleblowing channel.

## 11 COMING INTO FORCE

These ethical guidelines have been approved by Consti's management group on 14.06.2021.