

# Neomore Code of Conduct

We at Neomore are committed to conducting responsible, safe and sustainable business. Neomore's Code of Conduct applies to all Neomoreans, employees, managers and the board alike. Commitment to these ethical principles can be mandated from stakeholders including suppliers and subcontractors **(from now on referred to as Suppliers)**.

## 1 Respect for human rights and labour standards

### 1.1. Human rights

We operate in accordance with internationally recognized human rights and human rights-related commitments as well as national laws and regulations. We expect the same from all our stakeholders.

### 1.2. Labour

Our employees have the right to organize and engage in collective bargaining. Employees have the right to join associations, unions and choose a representative among themselves. At Neomore we follow the legislation regarding labour, company's terms of employment and employment agreements. The company's terms of employment and other related HR policies are presented in Neomore's HR playbook.

Work performed by children under the age of 15 is prohibited. Those under 18 may only work in roles that are not harmful to their health, mental development, safety, education, or dignity due to the nature or circumstances of the work. Those under 18 should not be engaged in night work or overtime.

Employees should be paid at least the minimum wage according to local legislation or collective agreements, and legal means of payment should be used for wage payment. Wages must be paid in a timely manner without delays. We foster equal opportunities and ensure that employees receive equal pay for work of equal value.

Working hours, vacation times and other working conditions must be consistent with applicable local laws and international standards.

Forced labour is prohibited. Signs of forced labour can be found on the Ministry of Economic Affairs and Employment's website.

### 1.3. Occupational health and safety

The work environment must be clean, safe and healthy. Employees should be provided with appropriate sanitary and break facilities. Machines and tools used in work should have appropriate safety devices and guards. When working at customers' premises, their safety instructions must be followed.

Neomore offers healthcare for employees, and we have an occupational healthcare action plan in place. Our occupational healthcare partner is Terveystalo.

Work-related accidents and hazards should be documented and investigated. Suppliers must prevent, identify, monitor, and report the occurrence of work-related accidents, near-miss incidents, health hazards, and encourage employees to report these and other potential hazards. These can be reported to [Neomore's Whistleblowing channel](#) or directly to a Neomore contact person.

Potential emergencies should be identified, and necessary plans and instructions should be developed. Corrective action should be taken promptly upon receiving information about potential exposures and hazards.

Our in-case-of-emergency exit plan can be found at the offices. When working or visiting in Neomore's premises, Neomore's safety and security requirements must be followed. We have an occupational safety representative.

#### **1.4. Non-discrimination**

Any discrimination based on race, gender, ethnic background, language, religion, nationality, age, political or sexual orientation, or any other similar characteristic is prohibited and condemnable. Neomore has an equality and non-discrimination plan in place.

Employees and Suppliers should be treated fairly, respectfully, and equitably, and all forms of discrimination against employees are prohibited.

Harassment and bullying of employees is not tolerated in any form, physical, mental or verbal, or via any channel. This includes inhumane, inappropriate or offensive treatment of employees, including sexual harassment and abuse, physical punishment, mental or physical coercion and harassment, and threats of such treatment.

## **2 Compliance with legislation and good business practices**

Neomore and its stakeholders, including Suppliers, must comply with all local laws as well as international agreements and human rights laws.

### **2.1. Anti-Corruption, Gifts and Representation**

Any form of bribery, corruption, fraud, theft, money laundering, illegal tax evasion, or violation of other applicable laws is strictly prohibited.

We may occasionally offer hospitality to clients or suppliers—such as meals, coffee, or attendance at business-relevant events—provided that:

- There is a **clear business purpose**
- The value is modest and **does not exceed 150 € per client**.
- It complies with the recipient's policies regarding gifts and entertainment.
- It does not include cash or cash equivalents (gift cards require pre-approval)

We may accept reasonable hospitality or tokens of appreciation from clients or suppliers when:

- The value is modest (e.g., branded items, occasional lunches, or attendance at professional events).
- **It does not create a sense of obligation or a conflict of interest.**

It is especially important to ensure that no entertainment or gifts from suppliers affect—or appear to affect—supplier selection, contract negotiation, or performance evaluation. If you are unsure whether a gift or invitation is appropriate to give or receive, always consult your manager before proceeding.

## **2.2. Competition law and conflict of interest**

Suppliers must comply with competition laws and prevent the formation of cartels. Fair competition principles must be observed in business operations. Suppliers must act in an open and transparent manner and avoid and mitigate situations which create or have an appearance of a conflict of interest. Suppliers must notify Neomore of any actual or potential conflict of interest as soon as the Supplier identifies them.

## **2.3. Trade sanctions**

Suppliers shall not buy from or supply products, services or materials to any countries, territories, individuals, or entities in breach of any applicable sanctions, export restrictions and other similar restrictive measures, including but not limited to those issued by the United Nations, European Union, United States, and United Kingdom.

## **2.4. Data protection**

All stakeholders, including Suppliers, shall protect entrusted confidential and sensitive information with appropriate care and ensure the cybersecurity of their operations by identifying risks and implementing adequate controls. Stakeholders are committed to adhering to the principles of good data protection and complying with relevant data protection laws and regulations. Additionally, stakeholders shall respect the privacy of personal data belonging to employees and other stakeholders, ensuring that such data is collected and processed only as needed for legitimate and clearly defined purposes.

All employees must ensure that business secrets and other non-public information is kept confidential and such information is only accessed by and shared to authorized parties. Information and other assets of Neomore's customers, suppliers and other business partners that are under Neomore's responsibility must be protected as if it was our own. Protection of confidential information continues after the employment.

All Neomore employees must complete a yearly security training. This is also a mandatory part of the onboarding.

## **3 Environment and climate**

Neomore recognizes the urgency of climate change and wants to promote and work toward a more sustainable business environment. We see sustainability as a prerequisite to being able to compete in the modern markets. We are committed to mitigating climate change by offering our customers solutions that help them track, report and mitigate their own negative environmental and societal impact and be a partner in helping them reach their own sustainability goals.

We monitor our own environmental impact and take action to minimize noted harmful effects. We seek to find ways to mitigate our own carbon footprint. We prefer and encourage business travel and commuting by public transport and offer our employees a bike benefit.

#### **4 Raising concerns**

We strongly advise all stakeholders to raise any concerns regarding breaches or suspicions of breaches of this Code of Conduct via our Whistleblowing channel. The channel is available for internal and external use and can be found on our website and our intranet.

All reports are taken seriously and handled with discretion and confidentiality.

Suppliers must promptly notify Neomore's contact person if they are unable to commit to the guidelines outlined in this document.

*Approved by the Neomore Board of Directors in March 2025.*