

KREATE GROUP'S

Code of Ethics for Subcontractors



Kreate Group's Code of Ethics for Subcontractors

For us at Kreate Group, responsibility is a joint matter based on the core values that guide our operations: integrity, humanity, ambition and straightforwardness. We expect ethical conduct and behavior in accordance with our values not only from our own personnel but also from our subcontractors and partners.

The Code of Ethics clarifies our expectations for our subcontractors and provides a framework within which we cooperate. The purpose of the Code is to serve as a basis for honest, responsible and mutually respectful cooperation.

Together we are building an even better future.

The principles of the UN Global Compact initiative and the International Labour Organization's (ILO) Universal Declaration of Human Rights have been applied when compiling this guide.

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Responsibility is everyone's business

This Code of Ethics contains guiding principles that facilitate operations and decision-making in our daily work. When we act ethically, responsibly and with integrity, we become stronger as individuals and, thereby, as a company and a team. Sustainable business operations and responsible leadership are based on people – the way we act and treat each others as individuals, supervisors and coworkers.

DO THIS:

- Adhere to laws, regulations and Kreate's practices.
- Operate openly and with integrity.
- Treat your coworkers and partners fairly and with respect.
- Do not hesitate to speak up even about difficult things and report any violations.
- Make sure you follow the Code of Ethics. If you act as a supervisor, you also need to require that your team follows the Code.

By adopting the Code of Ethics, we can apply its principles in our everyday work. Actions that deviate from the Code of Ethics are prohibited – even if they are done in good faith. They may damage Kreate's reputation as a good operator, employer or partner, or even lead to legal actions being taken against the company or contractual undertakings.

Applying the Code of Ethics

This Code of Ethics applies to all subcontractors, contractual service providers, suppliers and their employees.

Kreate Group's personnel comply with a broader Code of Ethics for Personnel and the partners described above comply with this Kreate Group's Code of Ethics for Subcontractors.

We expect our own personnel and everyone working with us to commit to responsible conduct and behavior.

Is the activity legal?

Does it comply with Kreate's Code of Ethics and other policies?

Could you tell Kreate's representative, your supervisor or the company's management about the activity?

Would it look good if it was reported in the news?

If you hesitate or answer no to even one of these questions, it means that the activity is not appropriate and must be interrupted. Report the event via our FirstWhistle channel.



BUILDING WITH PASSION

- We operate in a transparent and ethical way

At Kreate Group, we operate ethically in compliance with laws and regulations, and we never attempt to seek profitability and success through questionable means. It is of utmost importance to us that we are worthy of the trust that our customers and other stakeholders put in us. We act openly and equally towards each other – everyone working in our projects is an important asset for the company's sustainable success.

Complying with the laws and preventing the grey economy

We commit to following the laws and regulations in force at any given time as well as Kreate's policies. It is absolutely necessary that everyone knows the laws and regulations concerning their work and how they are applied. Everyone needs to understand that deviating from the laws and regulations may result in severe consequences to individuals or the company.

We conduct business ethically and act fairly and honestly as employers and contractual partners. We act according to good construction and contract practices and want to ensure the satisfaction of our partners through our honest and transparent operations. We do not tolerate bribery, blackmail, corruption or other actions aimed at limiting competition. We are continuously monitoring and developing our practices and will immediately intervene in unethical activities.

At Kreate, we make sure that we recognise the main contractor's obligations and sign the appropriate contracts with the relevant appendices with every partner that we employ. We require that the subcontractors and labour hire companies we use have tended to their legal obligations and commit to our ethical guidelines. Kreate does not allow the use of so-called "light entrepreneurs" or foreign labour hire companies

at its worksites. This prohibition applies to Kreate's direct contractual relationships as well as the chaining of contracts. We do not tolerate any kind of abuse or any use of forced or child labour. We actively work to prevent the grey economy and comparable activities.

CONSIDER THIS:

- Keep your competence up to date in terms of laws and regulations and act in accordance with them.
- For your part, ensure that all financial transactions only pass through the company's accounts.
- Keep all discussions with competitors to a minimum and make sure that they do not touch on commercially sensitive or business-sensitive topics.
- Make sure that you comply with Kreate's common decisions, commitments and procedures.

Openness and reliability in our operations

Reliability and doing what is promised is part of Kreate's corporate culture and operations. We expect our subcontractors to do the same.

Companies have lots of information and skills that are considered valuable assets. Everyone should use the information appropriately and with consideration in their work. Some of the information may be confidential, such as technical and financial information. Unauthorised utilisation of confidential information or their disclosure to third parties are not allowed. By protecting confidential information, we protect the entire company against risks that could harm our competitiveness and reputation.

We act with care whenever our work concerns confidential information, such as when we use physical documents, computers and mobile phones or discuss confidential information in open plan offices, during remote work and on public transport. In addition to our own confidential information, we respect and protect the confidential information of our customers and partners. We sign non-disclosure agreements, as necessary.

CONSIDER THIS:

- If you make a promise, deliver on it.
- Protect technical and financial information and know-how in our areas of special expertise.
- Act with care whenever you have a discussion in an open plan office, during remote work or in public places.



Data protection

We respect our employees', subcontractors' and other partners', and customers' - current, former and future - right to privacy. Kreate processes all personal information confidentially and in accordance with all data protection laws and regulations, including the General Data Protection Regulation (GDPR). We protect all the personal information we collect. We have a Privacy Policy, Privacy Notice and functions for implementing actions related to privacy protection. We sign data processing agreements when we disclose personal information to external parties.

When our worksites implement camera surveillance, the purpose is preventing and investigating situations that endanger safety, property and action processes, misuse prevention and investigating any occurred crimes and questions of liability. Only collect and process personal information according to their purpose of use.

CONSIDER THIS:

- Maintain the confidentiality of personal information and protect it against unauthorised access and disclosure.
- Only collect and use personal information that you need for your work or for compliance with statutory and contractual obligations.
- Only collect and process personal information according to their purpose of use.
- Make sure that the personal information you use is up to date and check that you do not store any unnecessary information. Ensure that unnecessary information is destroyed after their retention period expires.

Occupational well-being and equality

Equal treatment and openness are of the utmost importance to us. The basis of our operations is fairness and respect for human rights, whether related to our personnel, subcontractors, or other stakeholders.

We appreciate and assess the professional skills of our employees, not their personal characteristics. We recognise the importance of diversity, and we want to ensure equal rights, opportunities and treatment for all of our personnel. The principle of equality and non-discrimination is an integral part of our operations, and we require every employee to work according to the Code of Ethics, including all our subcontractors on our worksites.

We want to provide a work environment in which everyone feels safe and enthusiastic. Everyone must be able to perform their duties to the best of their abilities, and we do not tolerate any forms of harassment or bullying. Every member of the working community contributes to a safe environment in which everyone's voice can be heard. We encourage everyone to uphold and further develop our inclusive and open corporate culture.

We cherish high-quality supervisor work. We do not accept inappropriate elements of management culture, such as favouritism, conflicts of interest, questionable management methods, covering up events or looking the other way.

CONSIDER THIS:

- Actively communicate with your team and keep everyone equally updated on relevant topics.
- Treat every person equally regardless of their gender, age, nationality, religion, sexual orientation, gender identity, health or other characteristics.
- Make sure that the decisions concerning an individual employee are based on their competence, skills and professional abilities.
- Intervene in any insulting, humiliating, threatening or otherwise inappropriate behaviour that targets an individual or a group.
- Make sure that the working conditions are equal for everyone.



Human rights

We respect international conventions on human rights as well as national agreements. In addition to such agreements, we support fair working conditions with respect to the people working at our worksites and workplaces as well as throughout our supply chain. We sign contracts with reliable partners and expect that they also respect human rights and labour rights according to internationally recognised laws and regulations applicable to human rights and the work.

Human rights belong to everyone, and they cannot be taken away or waived. We take care of providing a safe and hygienic working environment. We prohibit any forms of coercion in our value chain, including child and forced labour, and other means that make employees work against their will.

We also respect our personnel's right to organise professionally, and we follow collective agreements. We provide employee representatives opportunities for performing their duties. We value all employees' political freedom of opinion, but we do not allow any political activities at our worksites or workplaces.

CONSIDER THIS:

- Treat all employees equally and make sure that everyone knows their rights.
- See to it that subcontractors, suppliers and other partners respect human rights.
- If you have people under the age of 18 years as subordinates, you will have to consider their special needs, such as especially careful work guidance and supervision. If an underage person performs hazardous work, submit a notice to the Regional State Administrative Agency (AVI) before starting the hazardous work. Before the employment of a young employee begins, remember to have the special agreement for young employees signed by the underage employee, their guardian and the supervisor. All Kreate employees must be at least 15 years of age.

Safety and health

Every Kreate employee and subcontractor has the right to a mentally and physically safe working environment. We want us all to go home healthy every day. As an employer, we bear the responsibility for the occupational safety and well-being of our personnel and continuously develop our operations in order to improve occupational safety.

Each new worker requires induction training concerning the company, job and worksite. Through active occupational health and safety activities, we develop the company's safety culture and improve occupational safety and well-being.

Each employee and contractor has the obligation to wear the necessary protective equipment, follow the safety instructions and address any shortcomings. By acting safely, everyone contributes to the positive development of occupational safety and well-being.

We ensure the further development of occupational safety with our own activities by reporting all near misses on the worksite and investigating any accidents. We track the company's 12-month rolling lost-time injury frequency on a monthly basis. We require that all our personnel and subcontractors commit to the occupational safety goals that have been set.

CONSIDER THIS:

- Do not work until you have been familiarised with the site and the task.
- Set an example: Perform your work safely, avoid risks and always wear appropriate protective clothing at the worksite.
- If the performance of the work is unsafe, stop the work. Take corrective actions or contact the worksite's responsible person or your own supervisor, for example.
- Report any near misses to Kreate's site management.
- Provide workers with induction training concerning their duties and the worksite. Ensure that they understand the safety aspects related to the work and use appropriate equipment. Document the induction training you provide.





REDUCING OUR FOOTPRINT

- We minimise the harmful effects on the environment and people

We consider the environment in our operations and aim to develop our activities in line with the principles of sustainable development. We impact the world around us in many ways when we build diverse infrastructure projects. We operate in an industry that generates emissions, and it has several opportunities for improvement. The choices we make in terms of construction materials, working methods and our partners have far-reaching impacts on the environment.

Promoting the circular economy and environmental aspects

The responsibility for our impacts is important for us as a company but also for our personnel, customers, investors and other stakeholders. Good choices lay the foundation that enables us to build the urban environment as well as our business in a sustainable way. We develop business that supports the circular economy to support our own activities as well as those of our clients and partners, and continuously consider the circular economy in our actions.

We consider the environment in our operations, and we identify and assess any potential environmental risks in our operations and proactively prevent them with a conservative approach while reducing our environmental burden. We adhere to the valid legislation concerning the environment and waste management and ensure that the necessary permits are applied for, and reports are made appropriately. We aim to reduce the environmental burden caused by our service over its entire life cycle by applying functional solutions and creating high-quality end results.

We train and guide our personnel to consider the environmental aspects in everything we do. An important element in all of this is Kreate Group's environmental manual, which compiles all of Kreate's instructions and forms that are related to environmental aspects. The most important operating instructions can also be found in Kreate's general contract programme.

We promote the reuse of materials as well as their recycling and utilisation. We reduce the amount of waste in all our operations. We take care of sorting waste and deliver it to the appropriate collection points, and we track the volumes of waste. We also assess the opportunities for using recycled materials and industrial side streams at each location, and we use them as replacements for natural materials. We expect our subcontractors and other partners to follow the same principles and instructions. We do not accept any violations of the laws and regulations under any conditions.

CONSIDER THIS:

- Consider the environmental impacts and comply with the environmental legislation and authority regulations.
- Prevent the generation of waste at our sites and promote the reuse, recycling and utilisation of materials.
- Report potential environmental risks or any environmental damage without delay and take action to correct the situation.



GROWING OUR HANDPRINT

- We build sustainably

We take a responsible and sustainable approach to ensuring the best possible results. Together we build sustainable infrastructure while considering the ethical aspects.

Conflicts of interest and company property

Conflict of interest refers to a situation where personal interest is, or would appear to be, in conflict with the company's interests. When making business decisions, the interests of the company and organisation must always be considered. We never use our position or influence to promote any interests other than those of our company. Our decisions are not based on personal relationships or pressure.

It is important for us that everyone can perform their work objectively, efficiently and in line with the best interests of the organisation. Any potential conflicts of interest must be reported to the supervisor without delay.

Conflicts of interest may arise in many different contexts; if you are unsure, you can ask for approval from your supervisor or, to be absolutely sure, have your supervisor decide on the matter. If the matter concerns family members or the immediate circle of an employee, the decision regarding Kreate's employees must be approved at one level above the employee's supervisor.

We also secure our business by protecting and maintaining the Group's physical and intangible property, such as facilities, equipment, trademarks, patents, trade secrets and similar. We use the company's property according to instructions and we never take goods or items related to the business outside the place of work, unless such transfers are authorised.

CONSIDER THIS:

- Avoid possible conflicts of interest.
- Make fair and equal decisions whether working on recruitment or procurement. Personal relationships must not influence decision-making.
- Protect Kreate Group's tangible and intangible property.

Gifts and hospitality

The gifts that we give and accept are conventional for the business and cannot differ from the normal standards for hospitality in the industry. At Kreate, we never ask our partners for personal gifts or benefits. We also do not accept or offer gifts that could harm the company's reputation or negatively affect its trustworthiness in the eyes of our clients or other stakeholders. In order to ensure that the gifts we give to our customers and partners are appropriate, all business gifts must be procured from contracted vendors.

During contractual negotiations, we never give gifts or other entertainment to, or accept them from, the other party. We expect our subcontractors and other partners to adhere to the same level of ethical behaviour in relation to gifts and hospitality.

CONSIDER THIS:

- Make sure that any gifts or hospitality that you accept and offer are minor in value and comply with the laws and Kreate's policies.
- Decline all requests for inappropriate gifts, payments or favours and report them via the FirstWhistle channel.



Events

When inviting Kreate representatives to events, please note that we only participate in events that are related to our business and where participation is justified. The nature of the events must also not be questionable in terms of good business practice, and it must not give cause for any doubt of unethical business practices, such as bribery or competition restrictions.

In case of suppliers or partners' external events that require travelling, the company pays the travel expenses of participants from Kreate Group. If the nature of the event involves recreation or other activities that do not promote the business, no working hours may be allocated to the event. The costs for our employees' recreational trips must never be paid for by our partners.



Competition

We compete openly and fairly in accordance with the competition legislation. We do not approve of competition restrictions and will not participate in any actions aimed at restricting competition or the planning of such actions. We ensure that we can identify the risk factors relating to competition law. Everyone is responsible for ensuring that they do not expose themselves to situations where competition law may be broken.

CONSIDER THIS:

- Make sure that any discussions with competitors do not touch on commercially sensitive topics.
- Ensure that you do not make any agreements on commercial terms and conditions with competitors, including warranties and other contract terms.

Do not hesitate to raise concerns

Everyone working at Kreate Group and Kreate's subcontractor is responsible for following the Code of Ethics on their part. In addition, everyone has the obligation to intervene in actions that violate the Code of Ethics. We encourage open dialogue with supervisors and managers concerning the Code of Ethics and other matters.

Here's how you can report your concerns about compliance with the Code of Ethics:

- **Make a report via our FirstWhistle channel.** This is a reporting channel that meets the regulatory requirements and provides strong protection for the whistleblower's identity. You can access the channel at: <https://kreate.fi/en/whistleblowing/>. If a person reports a guideline violation in good faith, they must not be subjected to disciplinary actions or changes to their employment.

The FirstWhistle channel allows anyone to anonymously report their suspicions, observations or concerns about violations that may have occurred in the organisation. Kreate handles all the reports confidentially and acts on the provided information fairly and without delay. Kreate does not allow any punitive or retaliatory actions to be taken against a person who reports a guideline violation in good faith.

Violations of the Code of Ethics may result in actions up to and including the termination of contract. If a report of a violation results in a reasonable suspicion or if the violation can be proved, the company will escalate the incident to be investigated by the competent authorities.



