

Supplier Code of Conduct Rule



tieto

Letter from the President and CEO

Dear reader,

Welcome to Tieto's Supplier Code.

Tieto strives sustainable development in all of its operations. We aim to be an ethical forerunner in all countries which we operate. Respect for human rights and fair labour conditions are fundamental part of our values. Tieto's business operations worldwide are based on internationally recognized environmental standards. Tieto promotes ethical business practices and fair competition. Tieto and its suppliers are expected to abide by all economical, ethical, and environmental laws and regulations.

Tieto and its employees have undertaken to act in accordance with Tieto's Code of Conduct. The purpose of this Supplier Code is to communicate the common set of ethical and business principles to guide our daily work with our suppliers. Sustainability must be extended to our suppliers value chains.

We expect all our suppliers and other business partners to respect the principles of this Supplier Code. Furthermore, the Suppliers shall ensure that their subcontractors are informed and they comply with this principles set out in this Supplier Code.

Thank you for taking this journey with us to further improve sustainability in business.

Kimmo Alkio

President and CEO

Tieto's approach

This Supplier Code of Conduct (The Code) is built upon the principles of the United Nations Global Compact, policy initiative ("UNGC") and is complemented with Tieto specific expectations.

The Code sets out the mandatory minimum requirements to be applied between Tieto and the Supplier and comprises of the following areas:

- Human rights;
- Labour conditions;
- Environment;and
- Anti-corruption

Scope and applicability

The Supplier shall at all times during the term of agreement(s) with Tieto comply with this Supplier Code in all countries they operate. It is the responsibility of the Supplier to ensure that its employees, relevant affiliated companies and subcontractors are informed about the content and comply with the requirements.

The Supplier undertakes to comply with the UNGC principles as well as local regulations and legal practices. In cases of conflict between relevant laws and the principles described in this Code, the highest standard shall prevail to ensure sustainable operations.

Human rights and labour conditions

Non-discrimination and equal opportunities

Employees are hired and treated in a manner that does not discriminate with regard to gender, nationality, religion, race, age, disability, sexual orientation, political opinion, union membership, or social or ethnic origin. The Supplier promotes the idea that all employees shall be treated with equal respect and dignity.

Furthermore, the Supplier promotes a culture of equal opportunities and diversity where appointments to jobs, rewarding and personal success depend on individual ability and performance. Fundamental human rights shall be known, understood and respected and applied equally to all employees whether temporarily or permanently hired, or contracted.

Physical abuse and forced labour

Employees shall not be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. Child labour or other forms of compulsory or forced labour, including trafficking, are not accepted.

In regard to child labour, the ILO convention No. 138 on the minimum age for admission to employment and work must be respected. No one under 15 years of age or below the country's legal minimum age is employed by Tieto's subcontractors.

Forced labour means "all work or service, which is exacted from any person under the menace of any penalty and for which the said person has not offered himself/ herself voluntarily". Examples of forced labour are for example withholding wages or identity documentation, restricting movement, fraudulent debt, violence, threat or intimidation.

Fair labour conditions

The Supplier supports the freedom of association, and all employees have the right to be a member of a trade union and to bargain collectively.

Wages and benefits

Suppliers should strive to pay all workers a wage that meets basic needs and provides a discretionary income in compliance with all national applicable laws.

Employees with the same qualifications, experience and performance have the right to equal pay for equal work with respect to their relevant comparators. Men and women should be equally remunerated. Working hours and overtime must be kept within local legal limits

Health and safety

All employees are provided with safe and healthy working conditions and environments. Adequate steps to prevent accidents and injury to health shall be taken by minimizing the causes of hazards inherent in the working environment and by providing appropriate safety equipment.

Environment

The Supplier shall have a precautionary approach in order to minimize environmental impacts within its value chain. The Supplier shall have an environmental management system ensuring effective planning, operation and control of environmental aspects. The Supplier's environmental management system shall be equivalent to the requirements in the ISO14001 or Eco-Management and Audit Scheme(EMAS). The environmental management system shall include a continuous improvement program.

Electronic waste, for example obsolete servers, computers and other ICT goods, must be recycled without harming the environment and with respect to human rights.

The Supplier shall acknowledge environmental legislation and applicable regulations and be able to provide evidence of compliance.

Anti-corruption and fair business practices

Anti-corruption

No abuse of power, nepotism or bribery, including improper offers of payments to or from employees or organisations, shall be tolerated. Gifts or similar benefits may only be offered to, or accepted from, a third party if modest in value and if consistent with reasonable hospitality given in the ordinary course of business.

Fair competition

Tieto is firmly committed to fair competition and open markets. We require free and fair competition and expect the Supplier to compete as forcefully and constructively as possible while at all times complying with international and national competition law and regulations.

Conflict of interest

Business decisions shall always be made in the best interest of the companies involved, i.e. the Supplier and Tieto both. Personal relations or considerations will never influence decision-making. Should there be any risk, however small, of conflict of interest, our employees are instructed to immediately inform their manager.

Fraud, extortion, money laundering and other related crimes

The Supplier shall abide by all applicable national and international regulations aiming at preventing, detecting and remedying economic crime and, in particular, fraud, extortion, money laundering and other related crimes. Tieto employees will refrain from any act or omission in connection to such criminal activities and shall actively cooperate with any inquiry in relation to such crimes.

Trade and sanctions compliance

The Supplier shall ensure that their business practices are in accordance with applicable regulation governing the import/export of their deliverables. The Supplier shall provide truthful and accurate information and obtain export licences and consents, where necessary. The Supplier warrants that it or its shareholders are not subject to any economic or administrative sanctions.

Insurance coverage

The Supplier is obliged to ensure that there are accurate and complete insurance schemes covering its operations, services and products.

Political involvement

The Tieto name, or any resources controlled by Tieto, shall not be used to promote the interests of political parties or candidates.

Confidentiality

By accepting this Code Supplier agrees on their respective confidentiality obligations with Tieto. In no event shall the Supplier misuse or disclose any information that may qualify as sensitive personal data, insider information of Tieto's present and future business operations, or other information the confidentiality of which is protected by law.

Privacy and Security

Privacy is a human right, and Tieto is thus committed to respecting and safeguarding (individual) data privacy. Tieto's suppliers are expected to collect, use, hold and process data carefully, responsibly and according to applicable laws and regulations as well as to take adequate security measures.

Compliance and sanctions

Continuous improvement and management systems

Supplier is required to have appropriate management systems to enable adherence to this Code. The functioning and quality of the management system shall be in proportion to the size, complexity and risk environment of the Supplier's business. This means that Supplier shall adopt a systematic approach to the assessment, mitigation and management of risks, measurable performance targets and monitoring and follow up of them. In addition, adequate communication and training about the requirements should take place.

Breaches reporting

Should the Supplier find any obstacles in meeting the requirements or find any breaches, those shall be reported immediately to the Supplier's main contact in Tieto or report anonymously and confidentially to the General Counsel of Tieto via Whistleblowing process by email:

whistleblowing@tieto.com

Actions inconsistent with the Supplier Code must be promptly corrected and may be subject to sanctions. In event of material breach Tieto is entitled to terminate the agreement with an immediate effect.

Communication and auditing

The Supplier shall provide Tieto with necessary information and allow Tieto or its representatives with an access to the Supplier's relevant premises and documentation in order to verify that the Supplier, its employees, relevant affiliated companies and subcontractors comply with this Supplier Code.

The Supplier undertakes to provide all necessary information of its management systems, environmental performance and all other relevant information to verify your compliance with this Supplier Code at least once a year to Tieto for reporting systems.

The Supplier and Tieto state that they will actively seek ways for further improvement in the areas of sustainability.

The content of this Supplier Code shall be reviewed on an ongoing basis.

Policy link

This rule is linked with the following Policy:

Policy name

Code of Conduct

Deviations

Deviations to this Rule need to be agreed with the Head of Sustainability.

Approving deviations/changes of purely technical nature are within the authority of the Rule Owner.

Procurement shall be responsible for keeping track of the deviations in a reliable manner.

Change history

Version	Change date	Approved by
V4.0F	2018-12-17	CEO

Tieto aims to capture the significant opportunities of the data-driven world and turn them into lifelong value for people, business and society. We aim to be customers' first choice for business renewal by combining our software and services capabilities with a strong drive for co-innovation and ecosystems.
www.tieto.com

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