

tieto

Supplier code of conduct



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Introduction

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Tieto is committed to maintaining the highest standards of ethical conduct in all aspects of its business and operations across its value chain in line with internationally recognized responsible practices.

To do business with Tieto, suppliers, as well as their subsidiaries, agents, affiliates and subcontractors (Suppliers) are expected to comply with all applicable laws and regulations and adhere to Tieto's Supplier Code of Conduct and apply a "precautionary principle" in their operations.

Tieto's Supplier Code of Conduct (the Supplier Code) outlines what is expected from Suppliers in ensuring that they do business ethically, respect others and act responsibly in the marketplace and in the societies in which they operate.

It sets minimum standards in key areas such as business ethics, anti-corruption, human rights, environment, security and privacy, and labour conditions throughout the value chain in alignment with internationally recognized standards, including the United Nations Guiding Principles on Business and Human rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, Science Based Target initiative, and the United Nations Global Compact signed by Tieto.

As a condition for doing business with Tieto, Suppliers must actively work to implement the requirements in this Supplier Code within their own operations based on the risk landscape inherent to their business and place the same expectations on their supply chain, at a minimum through appropriate contractual flow down requirements and a risk based approach to sub suppliers, including monitoring or follow up where relevant.

To demonstrate compliance with this Supplier Code, Suppliers are expected to have appropriate documented policies, processes or procedures, assigned responsibilities, training or awareness activities, and monitoring or review mechanisms in place, proportionate to the nature, size and risk profile of their operations.

In cases of conflict between applicable laws and regulations and the expectations described in this Supplier Code, suppliers are expected to comply with highest standard.



Doing Business Ethically

Suppliers to Tieto are expected to ensure their employees act with integrity and demonstrate zero tolerance for any unethical behaviour in their interactions with Tieto and within their own operations and supply chain. Suppliers are expected to have measures in place to prevent any form of abuse of power, nepotism, bribery and fraud.

2.1 Conflict of interest, gifts, hospitality and improper payments

Business decisions are made in the best interest of the companies involved, i.e., Suppliers and Tieto. All parties are required to avoid any situation where a personal interest conflicts or appears to conflict with company interests.

Actions by an individual to influence a company decision that may result in personal gain or gain for a family member or someone else close to the individual are not tolerated. This includes any form of improper payments or benefits (e.g., favours, gifts, hospitality, kickbacks), irrespective of the amount, that may be perceived influence, or attempt to influence, a decision or a transaction. This applies even when accepted by law and irrespective of whether such incentives are provided directly or indirectly through a third party – such as supplier's own agents, suppliers, business partners or consultants – or in the form of a sponsorship or donation.

Offering and accepting gifts, hospitality and business courtesies can only be accepted if they are minimal in value and frequency, and if the time and place are appropriate and proportionate in the context of business activities. Suppliers are obliged to maintain adequate controls to comply with applicable laws and regulations related to restrictions on offering anything of value to government and public sector officials or employees.

2.2 Fraud

Suppliers abide to all applicable national and international regulations aiming at preventing, detecting, and remedying economic crime, including fraud, unlawful release of protected information, extortion, money laundering and other related crimes. This includes having controls in place to prevent financial transactions with any company or subsidiary suspected of supporting terrorist activities or money laundering. Suppliers are also responsible for and ensuring that their employees refrain from any act or omission in connection to such criminal activities and actively cooperate with any inquiry in relation to such crimes.





2.3 Trade compliance

Suppliers ensure that their business practices comply with all applicable trade laws and regulations, including export controls, trade restrictions, trade embargoes, economic sanctions, and boycotts. Suppliers are responsible for obtaining export licenses and consents, where necessary and warrant that they or their shareholders are not subject to any economic or administrative sanctions.

Tieto expects its suppliers to have processes in place to identify and monitor their ownership structure, including beneficial owners, and to screen relevant entities against applicable sanctions lists.

2.4 Safeguarding Tieto assets

Suppliers are responsible for using Tieto's brand as well as any tangible and intangible assets made available to them only for legitimate business purposes and for protecting them from loss, damage, or unauthorized use.

Tieto's intellectual property – including but not limited to documentation, source code, scripts, integrations, know-how, methodology, concepts, inventions and ideas – is protected and managed in the interest of Tieto and in accordance with relevant regulations. Similarly, Suppliers are expected to respect the intellectual property rights and trade secrets of others and ensuring that infringement upon such rights is avoided.

2.5 Security

Building on a strong security culture, Suppliers have a responsibility to safeguard the integrity, effectiveness and availability of their products and services. In maintaining a secure environment for their employees, partners and customers, Suppliers are expected to enforce measures to protect sensitive information, prevent unauthorized access or misuse, limit the access to information based on role-based access control principles and uphold the integrity of systems and data according to applicable laws and regulations including EU NIS 2 Directive, EU Cyber Resilience Act, where applicable and relevant,

the implementation of appropriate security practices such as secure design and development, vulnerability management, timely remediation and updates, and the management of risks related to third-party components and dependencies.

In particular, Suppliers have a duty to protect the integrity and security of Tieto information gained through interactions with Tieto in accordance with applicable laws, regulations, contractual clauses.

This duty of confidentiality applies even after the termination of a supplier agreement, in accordance with the locally applicable periods. Suppliers have the responsibility to securely dispose or return all the information and IT assets after contract termination and decommissioning of any access privileges and credentials after the termination.

In case of any security incidents that may impact Tieto, its customers, or related data or systems, suppliers are expected to notify Tieto without undue delay.

Supplier code of conduct

2.6 Privacy

Suppliers are expected to respect and safeguard individuals' right to privacy and process personal data relating to their employees, customers, suppliers, partners and other stakeholders in a lawful, fair and transparent manner, protected from unauthorised access or unintended disclosure. Any processing of personal data must be limited in scope and duration to what is strictly necessary and carried out in accordance with applicable data protection legislation, including GDPR. Suppliers must ensure that any third parties they engage to process personal data apply equivalent standards. In the event of a personal data breach, Suppliers must notify Tieto without undue delay.

2.7 Responsible use of AI

Suppliers are to comply with applicable laws and regulations in the development, deployment and utilization of Artificial Intelligence, Machine Learning, Autonomous and Intelligent Systems or similar technologies (collectively "AI solutions") for or with Tieto or in development, deployment or utilization within their own operations. Suppliers are also expected to align their responsible practices to applicable legal and regulatory frameworks, including EU AI Act.

Where AI solutions are used in services provided to Tieto or in the Supplier's own operations, Suppliers are expected to have appropriate internal governance or accountability in place, conduct risk-based assessments of relevant AI use cases, and be transparent towards Tieto regarding the use of such AI solutions, where relevant.

Suppliers utilizing AI solutions are expected to apply a lifecycle-based approach covering design, development, deployment, monitoring and retirement, and ensure appropriate human oversight for decisions with potential legal, ethical or societal impact.

Suppliers are also expected to establish appropriate processes to monitor, identify, manage and report AI-related incidents throughout the lifecycle of AI solutions.

In case of any incidents that may impact Tieto, its customers, or related data, systems or decision-making processes, Suppliers are expected to notify Tieto without undue delay. AI-related incidents include, for example, material malfunction or degradation of AI system performance, erroneous or biased outputs with impact, failure of human oversight mechanisms, exposure of sensitive information through AI systems, or manipulation of AI models. Suppliers are also expected to distinguish, where relevant, incidents that may qualify as serious incidents under applicable regulation, including the EU AI Act, and to support Tieto in assessing potential regulatory implications. Suppliers are further expected to take reasonable measures to contain and mitigate the impact of such incidents and to support relevant investigation, documentation and remediation activities.

2.8 Insurance coverage

Tieto Suppliers are obliged to retain accurate and complete insurance schemes covering its operations, services and products.

2.9 Sourcing of minerals

Tieto expects that its Suppliers support ethical, environmental and socially responsible sourcing of all minerals. Supply chains that either directly or indirectly contribute to conflicts, serious human rights violations and negative environmental impacts are unacceptable to Tieto.

If the topic is applicable for the given Tieto suppliers and their subcontractors they are expected to conduct risk-based due diligence on the source and chain of custody of minerals in line with internationally recognized standards, such as the OECD Due Diligence Guidance, and to maintain appropriate policies, processes, and documentation.

Upon request, suppliers shall provide relevant information demonstrating their due diligence practices and risk mitigation actions.



Respect for others is fundamental



Building on the company's core values of openness, trust and diversity, Tieto treats employees, suppliers, partners and stakeholders with dignity and respect. Likewise, Tieto expects actors in its value chain to share its support and respect to all internationally recognized human rights including the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the UN Global Compact fundamental human rights, as defined in the International Bill of Human Rights.

3.1 Discrimination and equal opportunities

Suppliers promote a culture of equal opportunities and diversity, where fundamental human rights are known, understood, respected and applied equally to all Supplier's employees, whether temporarily or permanently hired or contracted.

Suppliers treat people on equal terms and do not allow any discrimination based on, e.g., sex, gender identity, nationality, religion, belief system, race, age, mental or physical disability, marital status, sexual orientation, political opinion, membership or non-membership of unions, or social or ethnic origin. Suppliers actively foster an inclusive work environment where all individuals feel respected, valued, and able to contribute fully.

3.2 Forced labour

Suppliers oppose all forms of modern slavery such as compulsory, bonded or forced labour, including trafficking. Any employment relationship with a given Supplier is freely chosen and free from threats. Employees are always free to leave their employment after the specified notice period.

3.3 Child labour

Suppliers uphold international and local child-labour standards across all our businesses and prohibits employment of any person under 15 years of age or below the country's legal minimum age are. Persons under the age of 18 do not perform any hazardous work, including but not limited to exposure to physical or psychological stress in alignment with the UN Convention on the Rights of the Children, article 32.

3.4 Freedom of association and the right to collective bargaining

Suppliers support freedom of association and the right to collective bargaining and all their employees have the right to be or not to be members of a trade union and to bargain collectively. No disciplinary action is taken against employees who choose or choose not to organize or join an association. Suppliers do not interfere or in any way obstruct employees' freedom of association, or right not to join an organization. Employee representatives are allowed to carry out their functions unhindered in the workplace.

3.5 Fair employment conditions

Suppliers promote secure employment and respects and upholds employees' right to fair and favourable working conditions.

As a responsible employer and business partner, Suppliers respect fair and reasonable compensation principles. This means paying a living wage or compensating in line with industry standards – whichever is higher and refraining from deductions from fixed salaries or wages as a disciplinary.

Employees with the same qualifications, experience and performance have the right to equal pay for equal work with respect to their relevant comparators regardless of any diversity aspects, e.g., gender. Suppliers respect the right to rest and leisure as part of supporting a healthy work-life balance, including working hours that comply with all applicable laws and industry standards.



3.6 Health and safety

Suppliers promote good health and a safe working environment in compliance with internationally recognized standards. This includes having mechanisms to control hazards, take necessary precautions to prevent accidents and occupational diseases, and provide a working environment free from all forms of bullying, harassment and acts of violence.

3.7 Reporting concerns and breaches

Suppliers are committed a culture where their employees feel comfortable to raise concern and report suspected violations, without fear for retaliation.

Suppliers are expected to have their own internal reporting mechanisms, ensure protection against retaliation, and provide appropriate training or awareness to employees on available reporting channels.

Where concerns cannot be adequately addressed through internal supplier channels, Suppliers and their employees are encouraged to use Tieto's Whistleblowing Channel.

Act responsibly in the marketplace

Suppliers are expected to treat everyone in the marketplace with the same ethical standards as they treat their own colleagues and act responsibly across their value chain.

This includes promoting support ethical business practices, resource efficiency, and minimize environmental harm, throughout the supply chain.

4.1 Responsible deliveries

Suppliers are expected to take a lifecycle approach, from development, usage and relevant end of life treatment of their products and services, considering both normal usage as well as cases of potential misuse. This includes promoting circularity and working actively to mitigate any potential risks to human rights, including risks to the right for privacy and non-discrimination as well as risks to the environment.

Suppliers are expected to consider reasonably foreseeable misuse or unintended use of their products or services, including potential human rights, security or environmental impacts.

4.2 Political activity

Suppliers are prohibited from using the Tieto name, or any resources controlled by Tieto, to promote the views or interests of political parties or candidates.

4.3 Fair competition

Suppliers abide by antitrust and competition laws and regulations. Suppliers have rules and procedures in place to refrain from causing or contributing to any breach of competition regulations, including but not limited to illegal agreements between competitors that aim to restrict or prevent free competition, fix prices or otherwise promote illegal trade practices.

4.4 Stakeholder relations

Suppliers select and treat their customers and own suppliers impartially and fairly and only engage with public authorities in an appropriate and transparent manner.

Suppliers communicate reliable and correct information and ensure that communication with media, including social media, public or financial markets, is performed according to professional and ethical standard.





4.5 Environment

Suppliers are expected to follow responsible environmental practices across their value chain by implementing and maintaining an environmental management system appropriate to the nature, scale, and risk profile of their operations, preferably aligned with internationally recognized standards.

Suppliers are expected to publicly commit to reducing greenhouse gas emissions in line with either science-based targets (SBTi) or equivalent, aligned with the goal of limiting global warming to 1.5°C above pre-industrial levels, and to actively implement measures to reduce their environmental impact.

Suppliers shall apply a precautionary approach to environmental management and promote circular economy principles across the full lifecycle of products and services, including design, manufacturing, transportation, use, recycling, and disposal. Natural resources shall be used efficiently, and waste, particularly hazardous and electronic waste, must be handled, treated, and disposed of responsibly without causing harm to the environment.

Suppliers shall measure, monitor, and, upon request, report Tieto relevant environmental data, including greenhouse gas (GHG) emissions through customer-defined questionnaires or recognized reporting platforms. All reported data must be accurate, complete, and verifiable, with appropriate supporting documentation to ensure auditability and compliance with regulatory requirements.



Transparency and reporting of suspected violations

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Suppliers are expected to cooperate with Tieto in verifying compliance with this Supplier Code and, where relevant, with other requirements related to the services or products provided to Tieto. Suppliers shall provide Tieto with access to relevant premises, documentation and information necessary to verify that the Supplier, its employees, relevant affiliated companies, and subcontractors adhere to this Supplier Code and applicable agreed requirements. Compliance may be verified through risk based and proportionate means such as self assessments, questionnaires, audits (onsite or remote), risk assessments, and certifications, including assessments related to management systems, standards or industry practices commonly subject to customer audits. Suppliers are expected to provide reasonable evidence of compliance, including policies, procedures, records, and certifications, upon request.

If a given Supplier finds any obstacles in meeting the requirements or find any breaches, they are required to report them immediately to the Supplier's main contact in Tieto.

If a given Supplier has access to Tieto or its customers data or systems, then Suppliers are expected to establish incident response practices and notify Tieto promptly of any security or data privacy related breaches.

Suppliers may also report suspected violations of this Supplier Code or other unethical conduct confidentially and anonymously through the Tieto Whistleblowing Channel available at <https://tieto.whistleblownetwork.net>

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

How compliance with the Supplier Code is assessed

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Tieto verifies compliance with this Supplier Code through risk-based and proportionate measures, which may include Supplier self-assessments, audits, certifications, and other forms of review. The scope and depth of assessments depend on the nature of the Supplier's services, risk exposure, and business criticality. Non-compliance with this Supplier Code may result in corrective actions, follow-up measures, or contractual consequences as described in this document.



Document information



7.1 Change history

Version	Approval date	Owner	Approved by
V3.0A	2026/05/09	Chief Procurement Officer	Deputy Chief Procurement Officer

Tieto is a leading software and digital engineering services company with global market reach and capabilities. We provide customers across different industries with mission-critical solutions through our specialized software businesses Tieto Caretech, Tieto Banktech and Tieto Indtech, as well as our digital engineering business Tieto Tech Consulting. Our around 15 000 talented vertical software, design, cloud and AI experts are dedicated to empowering our customers to succeed and innovate with latest technology.

Tieto's annual revenue is approximately EUR 2 billion. The company's shares are listed on the NASDAQ exchange in Helsinki and Stockholm, as well as on Oslo Børs.

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