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Code of Conduct of Lounea Group

This Code describes our way of conducting business in a responsible and ethical manner. The guidelines have been decided by the Board of Directors of Lounea. Our Code of Conduct is based on Lounea's values and sustainability, which guide Lounea's everyday operations towards our customers, partners and owners, and how we operate internally as a company.

Our entire operations are based on trust. Mutual trust is built within our company and between us and our customers, partners and owners. An essential part of trust is sustainability, which is a strategic issue at Lounea and is at the core of our strategy.

The purpose of the Code of Conduct is to help Louneans make the right decisions in our daily work. Every Lounean must be familiar with the instructions and act in accordance with them, and intervene in activities that deviate from the guidelines. This is part of our open culture.

Our Code of Conduct consists of 17 sections

1. Our values guide everything we do

Lounea values are:

- **Every customer meeting is unique**
- **We act fairly and truly care**
- **An active attitude is crucial**

At Lounea, the customer is at the heart of everything we do. No guidelines will produce the image we want for our customers unless we act in accordance with our values. That is why the values have been worked on together with the staff. At the same time, we think about how we work with each other, because that, too, will eventually be reflected in our customers. This is how our values were born.

Because **every customer meeting is unique**, we build the Lounea brand with each of our contacts. Our goal is to create added value for the customer from the very first meeting. We value and appreciate our customers as individuals.

We act fairly and truly care, which reflects our inner culture. We treat both our customers and our colleagues fairly. We keep the promises we make, and our quality can be trusted.

When it comes to keeping customers, **an active attitude** often **determines** whether the customer remains a customer or becomes a customer. We actively inform our customers about important issues. In the event of changes in our services and operations, we take a proactive approach and communicate with the customer. We handle matters professionally and without delay, and we are happy to visit the customer if the situation so requires.

2. We always comply with the law and the commitments we have made

- Compliance with the laws and regulations that are binding on us is the starting point for all our activities.
- In addition to general business legislation, our network operations are regulated by authorities who impose special requirements on us. These requirements relate to, for example, information security and protection, network infrastructure, preparedness, and the rights of service users.
- Each Lounean has a duty to know the critical legislation, commitments made, and internal guidelines concerning their own duties, and to act accordingly. In the orientation phase for a new employee, it must be ensured that the task-specific obligations are reviewed.

3. We respect human rights and are a responsible employer

- We respect and support human rights and equality in everything we do.
- We do not tolerate violence, abuse, bullying or harassment of any kind.
- We do not accept discrimination on the basis of gender, nationality or ethnic origin, age, religion, sexual orientation, political or other views, social status, family relationships, or other personal characteristics.
- As an employer, we follow the principles of non-discrimination in all our operations. Diversity strengthens our expertise and contributes to learning together.
- We are all responsible for the comfort and safety of our working community. Everyone has the right to work in a healthy and safe working environment.
- We promote well-being at work and occupational health and safety through good management and by taking care of our colleagues.

4. We take care of confidential customer and personal data

- The confidentiality and protection of the privacy of customer data, personal data and communications is essential in all our operations.
- We comply with applicable data protection legislation in all processing of personal data.
- We communicate openly about the processing of personal data.
- We process data for predefined purposes and only if the work task justifies it.
- Every Lounean respects privacy. We do not process log data, confidential information, or the content of the messages we transmit unless we have authorisation.
- We monitor and control the processing of data and regularly train our personnel.
- We also ensure that confidentiality is implemented for our partners. We clarify the background of our contract partners.

5. We respect the trade secrets of our customers and partners

- We take care of the appropriate handling and protection of our customers' trade secrets and classified information received from the authorities.
- We do not process or disclose trade secrets in our own operations or to stakeholders in violation of our instructions.

6. We procure responsibly and require our partners to act responsibly

We follow the principles of sustainable and responsible sourcing in our procurement and partner agreements:

- We comply with the agreements made and act fairly and transparently.
- We value partners who are innovative, who continuously develop their operations, and who have the right values and effective processes, measured high quality, and the ability to achieve agreed goals, and who bring value to our customers, personnel or owners.
- We check the background and operational safety of our partners and suppliers.
- We pay special attention to human rights, and we are committed to ensuring that there is no forced labour or human trafficking in our operations and supply chain.
- Our partners must have active processes to improve the use of limited resources (such as energy, water, raw materials), promote recycling and reuse, and ensure proper waste management.
- Our partners comply with applicable national and international environmental laws and standards and actively strive to reduce their own emissions.
- Our partners must commit to complying with the principles of responsible procurement in their own supply chains, as well.

7. We do not accept bribery, corruption or extortion

- We will never pay, offer, request, demand or accept bribes or other undue advantage.
- When offering or receiving hospitality or gifts, we act with care. Only a reasonable and customary gift is acceptable. We never give or accept money or anything like that as a gift.
- The person involved in the procurement process does not participate in the customer events of the tendering suppliers.

8. We always take care of data safety

- Data-safe operations consist of ensuring the confidentiality, integrity and availability of data, as well as the security of services and networks.
- Every Lounean commits to data safety.
- Our key methods of implementing information security are responsible operations, up-to-date systems, information security expertise, regular training, compliance with internal guidelines, data classification, access rights related to individual tasks, and monitoring of data processing events.
- We also monitor and report information security threats and incidents in accordance with our guidelines and applicable legislation.

9. The functioning of our network and services is a matter of honour for us

- Our goal is a 99.999% functional level in our network and services.

- The services we provide are crucial for the operations and well-being of our customers and society. For this reason, we pay special attention to the continuity and reliability of our services and network, in cooperation with our customers and the authorities.

10. Environmental sustainability and climate measures are genuinely important to us

- We offer our customers sustainable and environmentally friendly digital services, and we operate in a way that is as climate efficient as possible.
- We have set ourselves goals to reduce our own carbon footprint.
- Efficient and safe recycling is the everyday life of every Lounean, in addition to which, as a service provider, we take care of the recycling of used equipment.

11. The way we work builds a sustainable future

- With the help of digitalisation, we influence the content of our work, the way we work, our tools and environment, and good management.
- We utilise e-meetings and the possibilities of mobile work. Telecommuting is widely used, and our workspaces are modern multimode offices.
- This requires trust and open interaction, as well as clear goals from management.

12. We always compete fairly

- Cooperation between competitors is basically prohibited.
- Lounea operates in different roles in the market, and in some situations, cooperation with competitors may be allowed.
 1. We do not accept prohibited cooperation between competitors, and we do not discuss prices, productizations, future plans or other trade secrets with our competitors.
 2. We also avoid unnecessary contact with competitors. When we meet competitors, we only deal with what is allowed.

13. We communicate openly and follow a good corporate governance code

- We communicate with all our stakeholders in an open, fair and up-to-date manner, in accordance with the principles of the Good Governance Code.
- The principles of financial and investor communications are defined in more detail in Lounea's Disclosure Policy.
- We communicate actively and in a multichannel manner about our services and operations. When engaging in dialogue with our stakeholders on social media, we follow good manners and our internal guidelines.

14. We respect insider regulations

- We comply with insider regulations when buying, selling or otherwise trading Lounea shares.
- We treat inside information confidentially. This may include, for example, financial statements and profit and loss information, material changes in customer volumes, significant corporate reorganisations or structural changes.

15. We identify and avoid conflict of interest situations

- We are committed to responsible business conduct and avoid conflicts of interest.
- A conflict of interest is a situation in which a person is forced to make a choice between duties related to work and personal interests. Situations that can be expected to cause conflict should also be avoided.
- A conflict of interest may arise, for example, from a donation, sponsorship, or a significant agreement.
- Even if the agreement is in the company's best interests, a conflict of interest may arise in a situation in which the contract is concluded with someone in a person's close circle, such as a family member or other close relative.
- We will notify our supervisor of any side job or business activity. In this way, the employer can assess whether the work causes harm to the actual work or whether the work is prohibited, for example, due to a competitive situation.

16. We do not accept money laundering

- We contribute to the prevention of money laundering and terrorist financing with all the means at our disposal.
- Money laundering involves suspicion regarding the legal origin of funds, while terrorist financing can take place with legally acquired funds, in which case the suspicion is directed at the intended use of the funds.

17. We address grievances and, if necessary, report them forward

- It is up to each of us to adhere to these Code of Conduct principles and to promote their implementation.
- It is the responsibility of supervisors to ensure that the principles are implemented in their own teams.
- Every Lounean should report immediately if they suspect or know of any activity that violates the Code of Conduct.
- Louneans can ask for advice from or report violations of the code of conduct to their own supervisor, HR, or the safety director or CFO.
- Louneans, Lounea's partners, and other stakeholders in the company can also report violations of Lounea's Code of Conduct through the anonymous whistleblowing channel available on the Lounea website. All contacts are taken seriously and treated confidentially.