

30. SEPTEMBER 2020

DIGITAL FLASK AVOIN YHTIÖ

# CODE OF CONDUCT

# Code of Conduct

## DIGITAL FLASK AVOIN YHTIÖ

At Digital Flask, we are committed to our values of transparency, trust, respect, and communication. We act ethically in all business dealings.

This Code of Conduct explains our expectations and provides guidance for meeting these shared standards.

## PROTECTING CONFIDENTIAL INFORMATION

We protect our customers' and partners' confidential information. You should never disclose such information to anyone. That includes all of the following:

- The terms and conditions of agreements
- Their business and marketing plans
- Intellectual property (trade secrets, trademarks, copyrights, patents, and other intellectual property) and technical information
- Product plans and designs
- Business processes
- Personal employee or contractor information

- Any data generated or received from a third party that contains or is based on confidential information

Only individuals who need to know confidential information should have access to it, and such individuals may only use it for the purpose for which it was made available. Additionally, we must follow all applicable data privacy and information security laws and regulations.

## **FAIR DEALING**

We are committed to completing fairly and following antitrust and competition laws. We must never enter into any agreements-whether express or implied-that violate the letter or spirit of anti-competition laws. In particular, we must never discuss the following topics with competitors:

- Pricing
- Splitting potential customers or territories
- Any other tactic to unreasonably restrict competition

Also, we must never alter or draft agreements to conceal or falsify deal terms.

## **RECOGNIZING CONFLICTS OF INTEREST**

Digital Flask personnel must void conflicts of interest. Some examples of situations that could create conflicts of interest include:

- Loans or favors that a worker, a partner, or family member receives through Digital Flask.
- Improper advantages gained by acting on information learned from Digital Flask, our customers, or partners.
- Act on business opportunities that belong to Digital Flask, our customers, or partners.

If you think you might have a conflict of interest, raise the issue right away with your management.

## **GIFTS AND ENTERTAINMENT**

It is never appropriate to give or receive a gift or offer of entertainment if it is extravagant, creates a sense of obligation, or is provided with the intent to influence a business decision.

Generally, Digital Flask employees should never accept gifts or entertainment valued at over €100 per gift. Besides, we should not accept gifts or entertainment at any time during a Request for Proposal (RFPs) or other vendor-selection processes.

## **ANTI-CORRUPTION, BRIBERY, AND KICKBACKS**

At Digital Flask, we all follow anti-corruption laws. These include the US Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act, and the OECD

## Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

We do not tolerate, permit, or engage in any form of corruption, extortion, or bribery. That is true whether you are working with government officials or individuals in the private sector.

Here are a few key points to keep in mind about bribery and corruption:

- **Bribery** is offering or giving something of value to influence the recipient's actions improperly. Bribery is illegal everywhere Digital Flask does business, and the consequences for offering or accepting a bribe are severe. You may never offer, authorize, give, promise, or accept any form of a bribe, extortion payment, improper payment, gift, or benefit while working on Digital Flask's behalf.
- A **kickback** is the return of a sum paid (or due to be paid) as a reward for fostering a business arrangement. Accepting or offering a kickback violates this Code of Conduct.
- A **facilitation payment** is a tip or small payment made to a government official to expedite a routine government action, such as issuing a permit or providing utility service. These payments are illegal in most jurisdictions and are not allowed under Digital Flask's policies.

If you believe corrupt practices are occurring within the company, report your concerns to the management immediately.

## **FINANCIAL INTEGRITY, RECORDS, AND ACCOUNTING**

We must keep accurate books and records of all our business dealings with our customers and partners. These records must be following applicable standard accounting practices.

If you know any actual or potential financial, accounting, or books and records issues related to Digital Flask, report to the management.

## **UNDERSTANDING INSIDER TRADING**

We may have access to material, non-public information about our partners and customers. Information is material if a reasonable investor would consider it important in deciding whether to buy, sell, or hold a company's securities. You must never buy or sell securities while in possession of material, non-public information or provide that information to others who might trade on it.

If you have concerns regarding inside information or inadvertent disclosure of inside information, please contact your manager.

## **DIVERSITY AND NON-DISCRIMINATION**

We are committed to diversity and treating team members and partners with fairness, dignity, and respect.

We comply with all employment and safety laws, support human rights for all people, and foster a diverse and inclusive workplace.

We don't promote or facilitate any hate-related or violent speech or materials, whether in the workplace or through electronic communications or data transmission.

We identify, adopt, and integrate diversity to hiring, including equal treatment of minority- and women-owned businesses in the supplier selection process.

In particular, we make all employment-related decisions based on skills and aptitude, never on legally protected personal characteristics. While these characteristics may vary by local law, they generally include:

- Race
- Color
- Religion
- Gender
- National origin or ancestry
- Age
- A medical condition or disability
- Veteran status
- Marital status
- Pregnancy
- Sexual orientation

Solid teamwork also requires all employees to treat each other with dignity and respect. We never allow harassment or bullying in the workplace. In particular, our language and physical contact-that are sexual, coercive, threatening, abusive, or exploitative.

## **TRAINING AND COMMUNICATION**

Management at Digital Flask is responsible for establishing policies and procedures to ensure compliance with this Code of Conduct and all applicable laws and regulations. I.e.:

- Communicating the principles in this Code of Conduct to employees and third-party partners through training, policy, or other messaging
- Managing compliance with this Code by employees and third-party partners
- Promptly reporting violations and concerns to the appropriate contact
- Keeping reports confidential to the extent possible and permitted by law
- Protecting employees from retaliation for making a report in good faith