

## Firstbeat Code of Conduct

A code of conduct serves not only as a set of internal guidelines for the employees to follow, but also as an external statement of corporate values and commitments. Code of Conduct is reviewed yearly.

### Introduction

Firstbeat Technologies Oy (Firstbeat) requires its employees\* to act in compliance with all Firstbeat Policies. Firstbeat operates in employee wellness business and processes sensitive information of its customers and therefore requires absolute compliance with all regulatory requirements. Further, Firstbeat encourages openness and ethical behaviour in all business activities.

\*The term *employee(s)* in this document refers to all employees of Firstbeat and its subsidiaries and also to subcontractors' employees acting on behalf of Firstbeat, such as for example sales agents, consultants and other team members. The Code sets out the conduct expected of employees in Firstbeat, while also addressing behaviour that is not tolerated.

### Policy statement on labour legislation, slavery and human trafficking

Firstbeat is committed to full compliance with all applicable laws and regulations. Firstbeat respects human rights as set forth in the United Nations Universal Declaration of Human Rights and basic labor rights as defines by the International Labour Organization.

Firstbeat requires that local labour legislation is followed in Firstbeat's and its subcontractors' operations, including safe and healthy working environment and legislation related to working times, minimum compensation and other legally required conditions. Firstbeat has zero tolerance to modern slavery and commits fully to prevent slavery and human trafficking in its corporate activities, including ensuring that our supply chain partners, and subcontractors do not engage or support any form of slavery or human trafficking. Firstbeat does not use child or forced labor, or contract with suppliers or subcontractors using them. There are no operations within Firstbeat which have been assessed as having a high or medium degree of risk of involuntary labour in any form occurring. This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015.

### Work Safety and Health

Every Firstbeat employee has the right to a safe and healthy working environment. Employees are encouraged to report any safety concerns to his/her supervisor, the company health and safety responsible, the employee representative trustee or to Human Resources. Subcontractors are also encouraged to report concerns regarding work safety. The company is committed to arranging sufficient services for its employees to ensure safe and healthy working.

### Anti-Bribery Policy

The Finnish legislation prohibits giving or receiving bribes intended to influence the recipient to favour or reward the briber or a third party. Firstbeat follows the Finnish Chamber of Commerce's guidelines on

ethical business activity and anti-bribery. Firstbeat has zero tolerance for the use of bribery, corruption and other unethical or illegal ways of influencing in any of its business activities.

### **Improper Payment or Benefits and Conflict of Interest, Business gifts and Corporate Hospitality**

Firstbeat expects its employees to be loyal and to make business decisions in the best interest of Firstbeat. Employees must avoid all conflicts of interest, i.e. situations where their personal interest may be or appear to be in conflict with those of Firstbeat.

Employees who are entitled to make commitments on behalf of Firstbeat shall not accept for themselves or their family members or offer any personal gift or favours such as services or excessive discounts from or to third parties, who do or may do business with Firstbeat. Gifts include trips and hospitality where transportation or accommodation are paid by a third party or where recreational activities constitute a significant part of the program. Any hospitality must be in good taste, not excessive and in a business-friendly environment. The only exceptions are gifts with no notable material value.

Gifts may be offered or received to reinforce existing business relationships or when legally customary in the local culture. Gifts must be given openly and for an acceptable reason, such as anniversaries.

In particular, gifts should never be given if they are related to an open bidding or negotiation or if the gift may affect the recipient's ability to act objectively or may be viewed as harming Firstbeat's reputation by the public. Public authorities, who have any potential involvement in Firstbeat's business activities, may not be given any gifts.

Gifts with notable material value or several gifts from the same source or any cases where the recipient otherwise suspects possible breach of this policy must be reported to the employee's supervisor. The supervisor must in turn report any suspected breaches to the CEO in case of any doubt.

All supervisors are responsible for ensuring their employees and subcontractors are aware of and follow this policy. Any exceptions to this policy must be approved in advance with the Firstbeat supervisor, who in turn is responsible for ensuring the exceptions are approved by the CEO of Firstbeat.

### **Information Security Policy**

Information is a valuable corporate asset. Firstbeat safeguards the confidentiality, integrity and availability of its proprietary information. All employees are responsible for the proper protection of Firstbeat's assets.

Firstbeat emphasizes security and privacy when processing personal data and is committed to protecting it according to the EU GDPR requirements. Employees and in-house subcontractors are required to undergo Information Security training according to separate instructions and confirm this to the Information Security team, including commitment to follow the Information Security Instructions, and they need to ensure they have received this training within two weeks of commencement of work. The Information Security Instructions include the Acceptable Use policy for IT devices and Internet usage, Intellectual Property Rights non-infringement policy, instructions for data classification, security incident reporting, visitor policy, password policies, remote work and travel instructions including a Clear Desk policy, device and information disposal instructions, and other important information.

## **Non-Discrimination**

All Firstbeat personnel shall be treated in a fair and equal manner by management as well as by fellow employees, in line with the Firstbeat's Playbook policy. All decisions regarding an individual employee shall be based on merit.

## **Freedom from Inappropriate Behaviour and Sexual Harassment**

Each employee has the right to be free from violations of personal integrity. Any type of harassment, regardless of intent, direct or indirect, physical or verbal, is prohibited. Offensive or inappropriate behaviour will not be tolerated. Victims or observers of behaviour that they believe to constitute harassment are encouraged to contact Human Resources or the company health and safety responsible. The "Harassment and Unprofessional behaviour" guide of Firstbeat includes detailed instructions for preventing, identifying and acting upon harassment or unprofessional behaviour.

## **Reporting of abuse of concerns**

To ensure compliance with the Code of Conduct, as well as to prevent breaches of European Union law that are harmful to the public interest, we encourage anyone to inform us of any abuse or concerns regarding suspected misconduct related to Firstbeat Code of Conduct or EU legislation related to public interests. It is vital for us to be able to intervene in any shortcomings and improve our activities.

All information related to any investigation of possible breaches of Firstbeat Policies or EU legislation, including bribery, corruption, labour legislation or other similar offences is considered confidential.

If you are uncertain or feel a potential issue may arise during the course of your work, regardless of whether it is intentional or coincidental potential breach to Firstbeat Policies, consult your supervisor, Firstbeat contact person or Firstbeat's legal function.

## **Accountability**

Non-compliance of Firstbeat policies may lead to penalties to the employee or termination of our relationship with third parties. If the company executive board (Johtoryhmä) or the CEO determine that any of the policies have been violated either directly or by a failure to report a violation, the party may be disciplined by penalties including written notices, demotion, suspension, removal or dismissal, as permissible by the applicable labour legislation. Violations may also constitute breaches of law, which may result in civil liabilities and criminal penalties both to the employee/subcontractor and Firstbeat. All parties are expected to co-operate in investigations of misconduct internally or by authorities.