



LocalTapiola Group

-Partner Code of Conduct

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Introduction

At LocalTapiola it is our duty to conduct business in a responsible, transparent and sustainable manner. Our co-operation partners are to comply with all agreements and this Partner Code of Conduct. We also want to be a good partner with whom to co-operate.

LocalTapiola Group's Partner Code of Conduct (the "Code") is a collection of key operating principles with which we in the Group have committed to complying and which we require our co-operation partners to follow.

'Co-operation partners' refer to all partners, suppliers and other parties with whom we engage in co-operation. Agreements signed by and between LocalTapiola and its co-operation partners may also impose obligations and policies other than those set out in this Code.

The Code describes the policies which we require our co-operation partners to follow, which we want to promote together with them, and the action of which we at LocalTapiola do not approve. In addition, the Code determines how we treat each other and the customers we share.

LocalTapiola is a mutual group of companies owned by policyholders, and our business aims at generating financial benefit and lifelong security to our owner-customers all over Finland. We also emphasise customer benefit in our co-operation relations. All our policies are based on the three values of benevolence, passion, and courage. We observe them in relations with our own employees, customers, co-operation partners, and other stakeholders.

As a Group we work to benefit our owner-customers and communities by creating added value with our business operations and through co-operation. We are an active contributor in the companies which we own, and we strive to foster sound management practices and responsible business. In addition, we expect all our co-operation partners to take care of their social responsibilities in an exemplary way. We encourage our co-operation partners to work towards promoting security in their sector and the well-being of people.

1. Legislation and regulatory provisions

LocalTapiola's co-operation partners are expected to comply with all legal and regulatory provisions as well as good practices and operating principles.

Across all areas of its business, LocalTapiola is committed to complying with the applicable laws and regulatory norms and recommendations valid from time to time as well as the industry-agreed shared good practices and operating principles.

Correspondingly in everything they do our co-operation partners are to follow the laws and regulatory provisions applicable from time to time. In addition, we expect from our co-operation partners compliance with the sustainable operating principles generally accepted in the sector and with procedures which are in line with good practice. We take an active

approach to combating financial crime, the grey economy, money laundering, and financing terrorism. We report all suspicions of money laundering as required by regulation.

Co-operation partners are responsible for the subcontractors which they use and for the actions of such subcontractors. We require that agreements, regular control and other applicable methods are in place to monitor the compliance of all subcontractors with the law, good practices and the agreed operating principles.

We expect our co-operation partners to actively monitor the legislation governing their sector and all regulatory provisions, and to proactively react to any changes which take place in the legislation applicable to the sector.



2. Privacy protection and data security

We respect everyone's right to have their privacy protected. Customer data and other personal data are to be processed with the strictest confidentiality and security and in a manner which is transparent and appropriate.

Trust is absolutely crucial to all activity in the financial sector. Personal data must be processed on a confidential basis. Our customers, employees and co-operation partners must be able to have trust that their data are kept confidential and secure under all circumstances.

We require that our co-operation partners ensure that the processing of personal data, including the collection, keeping, use, transfer, disclosure or erasure thereof, takes place in accordance with data protection legislation, all regulatory provisions and the good practices and operating principles which govern such processing. Under legal provisions, any

information on a customer relationship with LocalTapiola is to be kept confidential.

Whenever a co-operation partner processes personal data for which LocalTapiola is responsible as controller, it must comply, and it must ensure the compliance of its employees and subcontractors, with the issues defined in the agreement and with all other guidelines and provisions which concern the processing of personal data. Co-operation partners are also responsible for conducting their business operations with due consideration for data security, and for the training and guidance of other parties.

Any personal data breaches of personal data for which LocalTapiola is responsible should be communicated to LocalTapiola's address tietosuoja@lahitapiola.fi without undue delay.



3. Business practices, and co-operation

In our co-operation partnerships and delivery chains, we emphasise transparency, fairness and professionalism. We want to foster responsible business practices together with our co-operation partners.

The LocalTapiola Group companies adhere to good corporate governance, which is based on legislation applicable to the insurance and finance sector, the regulations and guidelines issued by the Financial Supervisory Authority and, where applicable, the valid corporate governance recommendations. We support and promote responsible and ethical business activities and transparency in decision-making and business.

In co-operation relations we expect parties to show an appreciative and deferential attitude with regard to each other and to implement what has been agreed together. We treat our co-operation partners professionally, fairly and equally and require the same reliable and honest treatment from them. LocalTapiola makes all decisions on co-operation and procurement on non-discriminatory and transparent criteria. With our actions, we foster fair, healthy and well-functioning competition.

We do not approve of bribery in any form. We will not accept or offer any personal payments, gifts or benefits which exceed ordinary and reasonable levels of hospitality and which can be assumed or expected to influence LocalTapiola or any business decisions.

In all co-operation efforts we respect each other's immaterial rights and business image. In co-operation relations we do not allow the use or utilisation of another party's company name, business signs or other immaterial rights without the prior consent of the right holder, and we do not compromise the reputation of others. We ensure that the business secrets and the other confidential data of all parties are protected, and we do not use or disclose them without authorisation. We expect our co-operation partners to do the same.

We require our co-operation partners to work towards good employee experience and customer experience and to monitor the development thereof on a regular basis. We expect our co-operation partners to contribute to the development of shared activities, customer satisfaction, and co-operation reporting.



4. Responsibility for people

The safety of people's work and their appropriate working conditions must be secured as required by legislation and agreements. We expect our co-operation partners to treat their personnel and customers on a non-discriminatory basis.

We require that our co-operation partners comply with the law and the general recommendations in issues pertaining to employees' employment relationships, working conditions and employment contracts. The implementation of the above must also be ensured in subcontracting chains.

We take proactive care of our employees' safety, occupational well-being and working capacity. We require that our co-operation partners

take care of the occupational safety of their own staff and that they ensure that all legal requirements to protect people's safety and well-being are met in their own activities and in subcontracting chains.

In its own activities and co-operation relations, LocalTapiola is committed to promoting the equality and non-discriminatory treatment of all people and respect for human rights. We do not approve of any discrimination, harassment or other inappropriate treatment in our work community or co-operation activities. We look after the safety and integrity of our employees and customers. We expect our co-operation partners to do the same in their own work communities, customer service and co-operation relations.



5. Sustainable development and environmental responsibility

In its business operations Local-Tapiola is committed to promoting the implementation of the principles of sustainable development. We expect our co-operation partners to assume responsibility for their own impacts on the environment and society. We want to co-operate with entities who work with us for these principles.

It is our duty to strive to reduce the harmful impacts which our activities have on people, the environment and society and to seek solutions and alternatives which improve on positive impacts and prevent loss and damage. We require that our co-operation partners fulfil their environmental obligations, and we expect them to work towards fostering sustainable development. It is our mission to safeguard the future of our owner-customers and of our business operations by actively contributing towards preventing and adapting to climate change.

In a goal-oriented manner we mitigate the harmful impacts which our activities have on the climate and the

environment. We take care of people, nature and local communities. We expect our co-operation partners to deploy efforts to mitigate the harmful impacts of climate change and promote environmentally-friendly policies, and to set related goals for their activities. We encourage all parties to cut emissions from energy consumption and transport, to promote material efficiency and recycling, and to develop operational sustainability.

At LocalTapiola we regularly assess and monitor the progress of the sustainable development goals and the impacts which our activities have on the environment and society. Our co-operation partners, other partners and suppliers play a key role in delivering on the responsibility and sustainability of the value chain of our business. We also expect our co-operation partners to consider these in their own business and subcontracting chains and to report on environmental, social responsibility and governance issues with consideration to the size and resources of the company.



Application of the Code

LocalTapiola's Partner Code of Conduct serves as a guide to how we engage in co-operation and procurement activities. We expect our co-operation partners and those working at LocalTapiola to comply with the Code.

The Code lays down LocalTapiola's common approach to co-operation relations and procurement. As a rule, we always act in the interest of the owner-customer on an independent and transparent basis. We respect the commitments which we have given, and we act honestly in all situations.

We expect our co-operation partners to act in accordance with this Code in our co-operation relations, partnerships and procurement efforts. This Code supplements the terms, conditions and operating principles set out in agreements. We regularly evaluate the up-to-datedness of the Code and revise it where needed. Co-operation partners may notify LocalTapiola if they detect or suspect the validity and appropriateness of any activity or approach or activities which may cause harm to the parties. LocalTapiola has in use a reporting channel which employees and external stakeholders may avail to report, anonymously or under

their own name, activities which breach the law, this Code or other guidelines.

All reports are processed confidentially by internal audit. We desire that the reporting channel be used in a low-threshold fashion, restricting to appropriate reporting only. The reporting channel is maintained as LocalTapiola's partner by Navex, on whose servers the data of all reports are kept. The personal data of anyone who submits a report are processed in accordance with data protection legislation. LocalTapiola's reporting channel: <https://secure.ethicspoint.eu/domain/media/fi/gui/104706/index.html>

We monitor compliance with the Code within the framework of co-operation. In all issues or situations which remain unclear, please contact your designated LocalTapiola contact person. Any activity which breaches the Code may be grounds to restrict or terminate the co-operation relationship. The unclear situations which may arise with a co-operation partner will be discussed in co-operation negotiations by the parties. We process and make decisions on breaches on a case-by-case basis.



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1. Legislation and regulatory requirements – In everything they do, LocalTapiola's co-operation partners are expected to comply with all legal and regulatory provisions as well as good practices and operating principles.

2. Privacy protection and data security – We respect everyone's right to have their privacy protected. Customer data and other personal data are to be processed with the strictest confidentiality and security and in a manner which is appropriate.

3. Business practices, and co-operation – In our cooperation partnerships and delivery chains, we emphasise transparency, fairness and professionalism. We want to foster responsible business practices together with our co-operation partners.

4. Responsibility for people – The safety of people's work and their appropriate working conditions must be secured as required by legislation and agreements. We expect our co-operation partners to treat their staff and customer on a non-discriminatory basis.

5. Sustainable development and environmental responsibility – In its business operations LocalTapiola is committed to promoting the implementation of the principles of sustainable development. We expect our co-operation partners to assume responsibility for their own impacts on the environment and society. We want to co-operate with entities who work for these principles.

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