

ALM Partners Code of Conduct

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1. About the Code of Conduct

This Code of Conduct document pertains to ALM Partners Oy (2372616-2) and ALM Group Oy (3018110-5), collectively referred to as the 'ALM Partners'.

This Code of Conduct will be reviewed annually and updated as necessary to reflect evolving requirements and best practices. As societal expectations and regulatory landscapes change, so too must our commitments evolve to remain relevant and impactful.

1.1. Version history

Version	Valid from	Valid to	Approved by
1.0	June 3, 2025	-	BoD (June 3, 2025)

2. Introduction

At ALM Partners, we are committed to conducting our business with the highest standards of integrity, responsibility, and sustainability. This Code of Conduct outlines our fundamental principles and expectations regarding environmental, social, and governance (ESG) practices. We believe that responsible business practices are essential for creating long-term value and contributing to a sustainable society. By adhering to this Code, we aim to foster trust among our stakeholders, including employees, customers, investors, and communities.

3. Purpose

This Code of Conduct establishes the principles and standards that guide our operations and reflects our commitment to responsible business practices. It sets forth our expectations for ethical behavior, environmental stewardship, and social responsibility. Our goal is to ensure that all activities within ALM Partners align with internationally recognized frameworks such as the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

4. Scope

This Code of Conduct applies to all employees, contractors, and business partners of ALM Partners. We expect all parties working with us to adhere to these principles and to promote them throughout their own operations and supply chains. Compliance with this Code is not only a contractual obligation but also a shared responsibility to contribute positively to society and the environment.

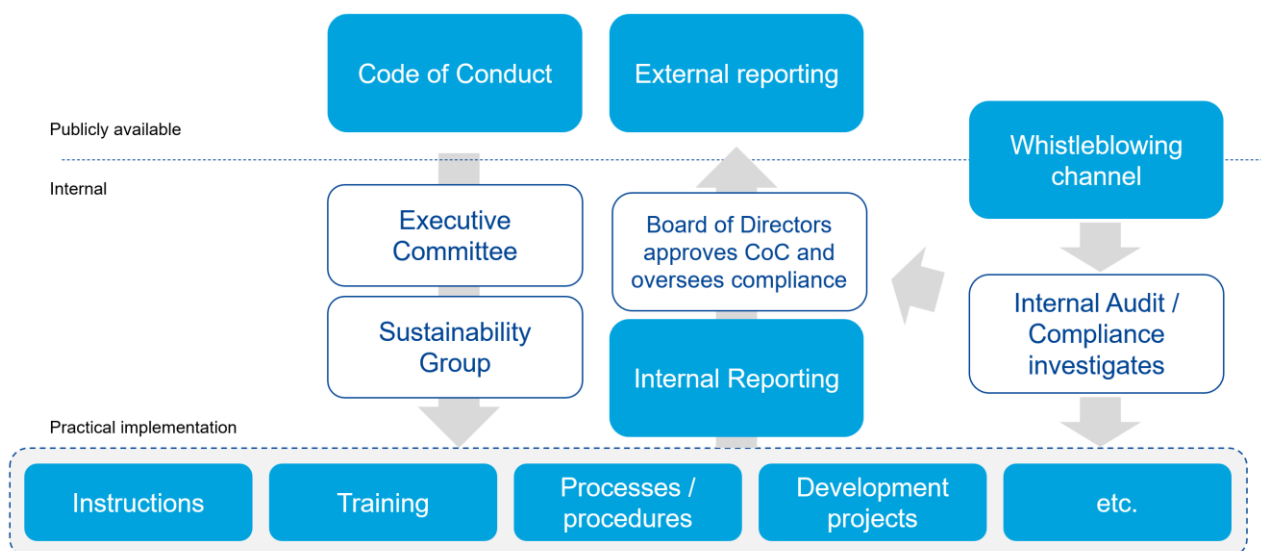
5. Our Commitments

We are committed to comply with applicable local, national, and international laws, regulations, and standards and operate in accordance with several key international frameworks:

- **UN Global Compact:** We uphold the ten principles of the UN Global Compact, which focus on human rights, labor standards, the environment, and anti-corruption.
- **UN Guiding Principles on Business and Human Rights:** We strive to respect human rights and address any adverse impacts caused by our business activities.
- **OECD Guidelines for Multinational Enterprises:** We implement due diligence processes to identify and mitigate risks related to human rights, labor, the environment, and corruption.
- **International Labor Organization (ILO) Core Conventions:** We support workers' rights, including freedom of association, elimination of forced labor, abolition of child labor, and non-discrimination.
- **Paris Agreement on Climate Change:** We commit to reducing greenhouse gas emissions and promoting climate resilience in alignment with global efforts to limit global warming.

6. Governance Structure

Governance structure at ALM Partners



6.1. Board of Directors

The Board of Directors plays a critical role in overseeing the company's sustainability strategy and ESG performance. The Board reviews and approves major ESG-related policies and initiatives, ensuring alignment between business objectives and sustainability goals. Through its oversight function, the Board

ensures that ALM Partners remains committed to responsible business practices while driving long-term value creation.

6.2. Executive Management

Executive Management is responsible for implementing the sustainability strategy across all levels of the organization. They monitor ESG performance and compliance, regularly reporting to the Board on progress and challenges. By integrating sustainability into core business operations, Executive Management ensures that environmental and social considerations are embedded in decision-making processes.

7. Core Principles

7.1. Labor and Human Rights

We are committed to upholding the dignity and rights of every individual who contributes to our success. To achieve this, we provide fair and competitive compensation that meets or exceeds legal requirements, ensuring employees can maintain a decent standard of living. We prioritize safe and healthy working conditions, prohibiting all forms of forced labor and child labor. Respect for freedom of association and collective bargaining rights is central to our approach, allowing employees to voice their concerns and negotiate terms fairly. Additionally, we actively promote diversity, equity, and inclusion, striving to create an inclusive workplace free from discrimination and harassment. Employee privacy and personal information are safeguarded, and opportunities for training and development are made available to enhance career growth. Finally, we enforce compliance with local laws governing regular working hours to prevent overwork and ensure work-life balance.

7.2. Health and Safety

The health and safety of our workforce are paramount. We maintain a safe and healthy work environment by providing necessary safety training and protective equipment, equipping employees with the tools they need to perform their duties safely. Emergency preparedness procedures are implemented to respond effectively to unforeseen events, minimizing harm to people and property. All workplace incidents are recorded and thoroughly investigated, with corrective actions taken promptly to prevent recurrence.

Beyond physical safety, we treat all employees with dignity and respect and secure a workplace free from harassment, abuse, and violence. We also promote employee well-being through wellness programs and mental health support.

Regular safety assessments help identify areas for improvement, reinforcing our commitment to continuous enhancement of workplace safety.

7.3. Environmental Responsibility

As stewards of the planet, we recognize the importance of protecting the environment for future generations. We comply with all applicable environmental laws and regulations, reducing our environmental impact and carbon footprint through best practices. Setting science-based targets for emissions reduction enables us to measure and track progress toward a low-carbon future. Resource

efficiency and waste reduction are prioritized in our operations through promotion of circular economy principles and life cycle assessments, while environmental management systems ensure systematic monitoring and control of our ecological footprint. Supporting biodiversity and ecosystem preservation aligns with our vision of sustainable development. Transparent reporting of environmental performance demonstrates our accountability and dedication to transparency.

7.4. Business Ethics

Integrity lies at the heart of everything we do. We maintain zero tolerance for corruption, bribery, tax evasion and fraud, enforcing strict policies to prevent unethical behavior. Fair competition practices ensure that we operate in a manner consistent with market norms and regulations.

We respect data privacy and protection of personal information through separate policies and procedures and training. Confidentiality and personal data protection agreements protect sensitive information, fostering trust among stakeholders.

Responsible sourcing of services and materials guarantees that our supply chain adheres to high ethical standards. Conflicts of interest are identified and managed proactively to avoid compromising objectivity. Anti-money laundering regulations are strictly observed, and accurate financial reporting builds confidence in our operations. Intellectual property rights are respected, encouraging innovation and creativity.

We are also committed to ensuring compliance with capital market regulations, including insider trading laws. To this end, we provide appropriate training and clear guidelines to our personnel.

7.5. Supply Chain Responsibility

Our supply chain represents an extension of our values and commitments. We expect our suppliers to adhere to this Code of Conduct, embedding responsible practices into their operations. Appropriate management systems should be implemented to address risks and opportunities systematically. Regular risk assessments enable early identification of potential issues, while transparent documentation facilitates verification and accountability. Reporting mechanisms allow suppliers to share concerns or violations openly, promoting a culture of openness and improvement. Furthermore, we require suppliers to cascade these expectations to their own suppliers, ensuring consistency across the entire value chain.

8. Implementation and Monitoring

8.1. Due Diligence

To ensure compliance with this Code, we conduct regular risk assessments to identify and mitigate potential areas of concern. Supplier screening and evaluation processes verify that partners meet our rigorous standards. Performance monitoring and reporting mechanisms track progress against set targets, enabling timely interventions when needed. Impact assessments evaluate the effectiveness of our initiatives, informing strategic adjustments to enhance outcomes. Corrective action planning addresses deficiencies promptly, reinforcing our commitment to continuous improvement.

8.2. Reporting and Documentation

Annual sustainability reports provide comprehensive insights into our performance, highlighting achievements and areas for improvement. Regular performance reviews engage stakeholders in discussions about progress and challenges. Maintenance of relevant records supports accountability and transparency, while material issues are disclosed openly to stakeholders through public disclosures of key material indicators related to sustainability. These practices underscore our dedication to transparency and stakeholder engagement.

8.3. Whistleblowing

Confidential channels for reporting concerns about potential violations of this Code of Conduct are maintained to encourage open communication. All reports are treated seriously, investigated promptly, and followed up with appropriate action. Employees and partners can report anonymously if desired, ensuring protection from retaliation. This mechanism fosters a culture of integrity and trust, empowering individuals to speak up without fear.

8.4. Compliance Monitoring

Regular internal audits verify adherence to this Code, identifying gaps and recommending improvements. Independent third-party assessments provide external validation of our practices, enhancing credibility. Continuous improvement processes drive ongoing enhancements to our systems and procedures. Performance tracking and reporting ensure visibility into compliance status, facilitating informed decision-making.

9. Non-Compliance and Remediation

Any suspicion of violation of this Code will be investigated promptly and thoroughly. Appropriate corrective actions will be implemented to address identified issues, ranging from remedial training to stricter enforcement measures. Reflecting our commitment to upholding high ethical standards, ALM Partner Group may, in cases of serious violations, apply commensurate disciplinary measures or terminate employment contract or business relationship. We remain dedicated to continuous improvement, learning from past experiences to refine our practices further.