

# Code of Conduct

## Introduction

Sponda's Code of Conduct provides ethical guidelines for the company and creates the foundation for its business operations and stakeholder co-operation. The Code of Conduct is supplemented by Sponda's internal policies, operational guidelines and commitments.

## Values

Sponda's values reflect how we act towards our customers and each other. Important values for Sponda are innovation, professionalism and reliability.

## Corporate governance

In its decision-making and governance, Sponda Plc complies with the Finnish Limited Liability Companies Act and other legal provisions governing limited liability companies and issuers of securities as well as the company's articles of association. In addition, Sponda complies with the European Market Abuse Regulation (MAR) and the Insider Guidelines of Nasdaq Helsinki Ltd. The company's operations are based on the Finnish Limited Liability Companies Act and the Finnish Securities Markets Act.

## Operational guidelines, policies and commitments

Sponda's operations handbook describes Sponda Group's way of working and the operational guidelines it contains ensure that the company uses consistent practices and operating methods. The operations handbook and its supplements are maintained on Sponda's intranet and updated regularly. Sponda's operations are guided by its disclosure policy, quality policy, purchasing policy, risk management policy, human resource strategy, human resource policy, and information security policy.

In addition, Sponda is committed to the ten globally accepted responsibility principles of the UN Global Compact, which are related to human rights, labour, environment and anti-corruption.

## Spondability

Sponda's goals are increasing shareholder value, sustainable operations and continuously developing the company. Responsibility is an integral part of our strategy and day-to-day operations. Spondability is Sponda's signature of responsibility, which communicates the company's holistic approach to responsibility.

Our vision, which guides the implementation and development of responsibility, is to be the most reliable, profitable and responsible player in the real estate sector, implementing sustainable development. We have highlighted the development of environmental responsibility and the customer experience as strategic focal points. We regularly report to our stakeholders on our actions and achievements related to corporate and environmental responsibility, and we continuously work to develop this reporting. We want to be the first choice of customers, skilled employees and investors.

We plan and evaluate our operations from the perspectives of economic, social and environmental responsibility. We carry out our business transparently, complying with legislation and regulations. As a major operator, we are responsible to many different stakeholders.

### **Our responsibility to stakeholders (customers, investors, business partners, society)**

Our operations are compliant with ethically acceptable practices and Sponda's values. We value integrity and do not condone bribery or corruption in any form.

We promote responsible operating practices in the property sector in co-operation with our partners. The aim of this co-operation is active and open dialogue based on reliability and integrity. We require that our co-operation partners manage their social obligations appropriately and operate transparently. In purchasing and contracts, we comply with the purchasing criteria that guide the company's purchasing process (competitive tendering and market-based purchasing).

The company has established operational guidelines to avoid conflicts of interest.

We aim for interactive partnerships in our customer relationships and we offer safe and comfortable business premises solutions that support our customers' operations.

Transparent reporting of the taxes and tax-like payments resulting from operations is one element of our responsibility.

### **Our responsibility as an employer**

Social responsibility at Sponda primarily concerns responsibility for employees and their well-being at work. Equality and non-discrimination are high priorities for us. Our objective is that employees do not experience any unequal treatment on the basis of gender, age, religion, health or other such factors. Fair and non-discriminatory treatment applies to the entire employment relationship, from recruitment to termination.

## **Our responsibility for the environment**

Environmental responsibility is one of our strategic focal points. We follow the principles of sustainable development in everything we do. As a responsible property owner, we take environmental perspectives into account in all of our operations, including the design, construction, maintenance, repair and use of properties throughout their life cycle, and the actions of our employees.

We are committed to reducing energy consumption, carbon dioxide emissions and water consumption, and increasing the waste recycling rate, at our properties. We maintain a high waste recovery rate. We work together with our customers to reduce the environmental impacts from the use of properties. Our new property development projects are implemented in accordance with international environmental certification systems. Competence in, and management of, environmental issues is factored into our choices of co-operation partners. We are also committed to reducing the environmental impacts arising from our own operations.

## **Implementation of this Code of Conduct**

Sponda's Code of Conduct was approved by the Board of Directors of Sponda Plc on 3 February 2015. The Executive Board of Sponda Plc approved an updated Sponda's Code of Conduct on 23 March 2018.

This Code of Conduct applies to all of Sponda's operations and it guides our day-to-day work. The company will ensure that its employees are aware of the significance of the Code of Conduct and familiar with its contents. Everyone at Sponda is responsible for acting in accordance with these guidelines. Any conduct in breach of this Code of Conduct must be immediately reported to supervisors and the company's management.