

TOSIBOX[®]

Code of Conduct 2021

V1.0

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LETTER FROM THE CEO

Best businesses draw strength from a strong and clear set of values. Our values – we care, we solve, and we are brave, for you – shape our culture as a company and are the foundation of this Code.

Our Code of Conduct forms the framework for all our operations and sets out standards of behaviour for all employees including executives without exception. Our Code of Conduct has been approved by the Board of Directors.

It covers topics relating to legal compliance and disclosure, conflicts of interest, gifts and anti-bribery, HR practices, Human Rights issues and environmental matters. By following the principles of the Code, we will succeed collectively, as a company and as individual employees. We will also build trust with customers, suppliers, communities, and each other. Naturally, the Code cannot provide an answer to every question. In these cases, please stop and think, ask the opinion of colleagues or supervisors and act in accordance with our values.

Most important of all, always speak up when something doesn't seem right. In doing so, you actively contribute to the success of this great, dynamic and moving forward company. After all, business is all about trust.

Kaija Sellman
CEO Tosibox Oy



ABOUT THIS CODE OF CONDUCT

The Code of Conduct is guidelines for how we as a company conduct our business in an ethically, socially and or environmentally correct manner.

IMPLEMENTATION OF THE CODE OF CONDUCT

All Tosibox employees must comply with the Code of Conduct. Employees are encouraged to contact managers, HR or other appropriate personnel when in doubt about the best course of action in a particular situation.

Tosibox strives to ensure compliance with the Code of Conduct by training employees, by raising awareness through active communication and by developing our risk management, monitoring, and reporting processes.

Employees who violate the Code are subject to disciplinary action up to and including termination of employment. Employees are required to report any possible violations against this Code to their own superior or to the HR manager. Reporting is also available through the Whistleblowing channel, which is available on corporate website ethics@tosibox.com. This channel is also available for any of the company's external stakeholders. Concerns and issues can be confidentially addressed to the HR Manager.

Any person(s) reporting such violations are not to be retaliated in any way for making such a report. In all instances the rights and privacy of both the reporting person(s) and the one(s) accused of violations are to be adequately protected and assured.

The Tosibox Code of Conduct is based on the 5 principles. The Code of Conduct deals with doing business right way, human rights, labour law issues, the environment and anti-corruption. These areas comprise the essential parts of the responsibility. This Code of Conduct has compliance **policies**, detailed below. Employees should read these policies in conjunction with all possible internal documents and processes.

1. SPEAK-UP CULTURE AND WE DO BUSINESS RIGHT WAY



1.1 SPEAK-UP

Tosibox speak-up culture empowers employees to openly raise and discuss compliance questions and concerns and to seek guidance.

1.2 COMPLY AND REPORT

We are all responsible for complying with legal obligations and our Code of Conduct, and for preventing and reporting any potential violations in a timely manner using the provided channels.

1.3 BEST INTEREST

We act in the best interests of Tosibox and use property and resources primarily for company's benefit and to support business needs. Employees should promptly disclose all personal interests that might reasonably be perceived as affecting our judgment to perform our roles at Tosibox or that may create an appearance of impropriety.

1.4 GOOD WAYS

We avoid any activity at work or outside of work that might interfere with our obligations to Tosibox or that could hurt the good reputation of Tosibox.

2. HUMAN RIGHTS AND WE CARE ABOUT OUR PEOPLE



2.1 HUMAN RIGHTS

Tosibox supports and respects the protection of international human rights.

2.2 NO VIOLATIONS

Tosibox is not involved in human rights violations.

2.3 WE DO NOT ACCEPT ABUSIVE OR INTIMIDATING BEHAVIOUR

We uphold a zero-tolerance policy regarding any form of abuse, mistreatment, harassment, bullying, or intimidation towards anyone inside or outside of Tosibox. Creating a hostile work environment, bullying, or similar offensive conduct, such as making derogatory comments or displaying materials that are offensive are not accepted in any level.

3. LABOR LAW



3.1 FREEDOM

Tosibox maintains freedom of association in accordance with local legislation and all employees are free to start or participate in trade union activities. Tosibox recognizes the right to collective bargaining regarding employment terms. All our employees must respect everyone's right to freedom of thought, opinion, expression, religion and right to assemble peacefully.

3.2 FORCED LABOUR AND TERMINATION OF EMPLOYMENT CONTRACTS

All forms of forced labour are prohibited, and employees have the right to terminate their employment in accordance with local legislation or employment contracts.

3.3 CHILD LABOUR

Tosibox distances itself from all types of child labour. No person under the age of 15 shall be employed and in the case of particularly demanding tasks, the person must be at least 18 years old.

3.4 DISCRIMINATION

All discrimination, regardless of ethnicity, skin colour, gender, religion, political opinion, national origin, social origin, age, disability, HIV / AIDS status, trade union membership, and sexual orientation, should be avoided in employment or professional practice. Physical, sexual, or mental harassment is strictly prohibited.

4. ENVIRONMENT



4.1 COMPLY WITH ENVIRONMENTAL LAWS

Tosibox support the precautionary principle regarding environmental risks: We comply with relevant environmental laws and pay attention to how our operations impact the air, climate, water, land and biodiversity.

4.2 ACTING UP FOR ENVIRONMENT

Innovative solutions that reduce environmental impact are encouraged and Tosibox takes initiatives to promote greater environmental responsibility.

4.3 ENVIRONMENTALLY FRIENDLY TECHNOLOGY

Tosibox encourages the development and dissemination of environmentally friendly technology. Tosibox works with environmental issues from a preventive perspective.

4.4 CONTINUOUS REMEDY

We always take immediate action to remedy situations in which incidents, audits, and feedback highlight areas for improvement in environmental management.

5. ANTI-CORRUPTION AND BRIBERY



5.1 ZERO-TOLERANCE FOR CORRUPTION AND BRIBERY

Tosibox works against corruption in all its forms, including extortion and bribery. Zero-tolerance for corruption and bribery. No compromises, no excuses, no exceptions!

5.2 NO GIFTS BEYOND REASONABLE

At Tosibox, we do not accept or offer gifts that go beyond what is considered reasonable in the ordinary course of business. This means we never accept or offer gifts that could damage Tosibox's reputation or confidence in the company, our employees or business partners. Country-specific rules and regulations for gifts may be applicable.

5.3 WE DO NOT MISUSE CORPORATE RESOURCES

We understand that we may not use corporate resources for any unlawful or unethical purpose or to support any political activity. The same applies to any property entrusted to us by our business partners.

5.4 FAIR COMPETITION

Tosibox always competes fairly and respects all competitors. Compliance with competition laws and fair competition is our way of doing business and is important to our business strategy.

5.5 AVOID CONFLICTS OF INTEREST

We all may have relatives or friends who work for or have financial interests in customers, suppliers, or competitors of Tosibox or any of its subsidiaries. This kind of a connection creates a potential conflict of interest: Others might think that you give special treatment to such a business partner or that they may influence the actions you take on behalf of Tosibox. A conflict of interest arises if you have decision-making power or influence in dealing with that business partner. Note that a conflict of interest also exists if you supervise or are supervised by a family member or equivalent person or if you are considering hiring such a person. Direct supervision or hire by such a person is not allowed without consulting the HR manager.

6. THE TOSIBOX ETHICAL DECISION-MAKING MODEL



When faced with a potential ethics or compliance decision, consider these four questions before taking action:

1. Do you have enough information?

Consider consulting with a manager, supervisor, or others who may be knowledgeable about the relevant subject and can provide the information you need to make a proper decision about a matter touching upon ethics and compliance.



2. Does it conform with Tosibox values and policies?

If the proposed decision or action is not consistent with Tosibox values, our Code of Conduct, and related policies, reassess your decision. If it does not feel right, it is probably in conflict with our values and our expectations of employees to always uphold those values.



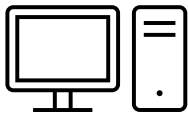
3. Is the decision or action legal?

If the proposed decision or action violates applicable laws and regulations, stop. We comply with applicable laws wherever we do business.

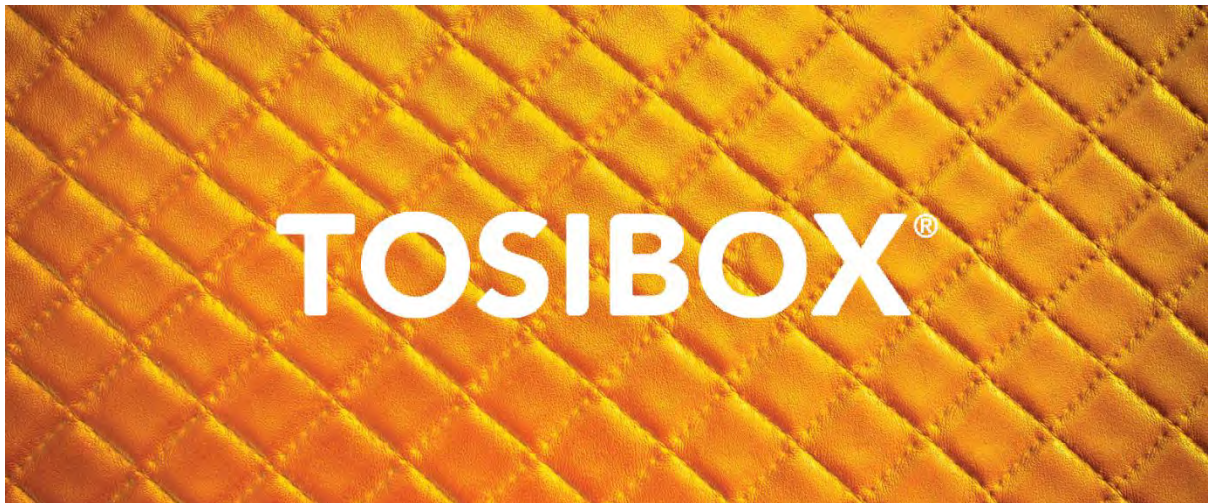


4. Will it look appropriate if it appears in the news?

Even actions that are lawful may be improper or may appear to others as such and can tarnish our name and reputation when seen on the news or spread over the internet.



7. COMPLIANCE IS A SHARED RESPONSIBILITY



EVERYONE:

- Role models for integrity
- Champion ethics & compliance
- Learn, understand & follow policies and laws
- Embrace Tosibox's values
- Speak up & ask questions



We have a strong sense of responsibility. We take responsibility for both our own work and our collective impact on society. We create sustainable solutions that are based on stakeholder insight.