



easor

CODE OF CONDUCT

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01

CEO's foreword

Easor is built on a foundation of trust, integrity and responsibility. As a provider of financial management services to a diverse range of customers, we understand that trust is not just a value — it is the core of our business. Every interaction, every line of code and every service we deliver reflects our commitment to ethical and lawful conduct.

The Code of Conduct serves as a clear and practical guide for all of us. It brings together the essential principles that shape how we work and interact — with colleagues, partners and customers. It is our guiding framework, ensuring that we stay aligned with our values and maintain the highest standards of professionalism as we grow.

Our Code reflects respect for people, environment, legislation and fair business practices. This respect is demonstrated daily in the way we operate and in the relationships we build. By honoring these principles, we strengthen the trust placed in us by our customers and stakeholders.

We are committed to fostering an environment where everyone feels valued and heard. This commitment is evident in our teamwork and in the way we engage with customers. The Code of Conduct supports this by empowering each of us to act with confidence and integrity.

If you become aware of any situation that may violate the Code of Conduct, speak up immediately. Each of us plays a vital role in protecting and enhancing our culture and reputation.

As we move forward, our dedication to ethical principles will guide every decision and action. This is how we create lasting value — not only for our company but for every customer who relies on us. By upholding integrity and responsibility, we are building a future that is sustainable, successful and trusted.


Otto-Pekka Huhtala, CEO

02

Code of Conduct in Easor

Easor Code of Conduct sets out, based on Easor's values, the requirements for all employees to adhere to in their daily work. The Code has been created to guide you and help you to comply with applicable laws and regulations as well as with other aspects that are required of you as Easor Employee. This Code of Conduct applies to all Easor Group companies and Easor employees and subcontractors wherever Easor is located and operates.

Easor core values are:

 Courage

 Care

 Will

Following aspects and rules have been provisioned to ensure that the code of conduct is created to be, and remain, effective and relevant:

- ❖ Easor Code of Conduct guides the daily operations and decision-making of all employees in all countries and locations.
- ❖ Easor trains and coaches its employees on the content and significance of the Code of Conduct.
- ❖ Easor requires employees to commit to the Code of Conduct.
- ❖ Easor monitors and supervises compliance with the Code of Conduct through various methods, such as annual test, internal audits, reporting and feedback.
- ❖ Easor handles and resolves possible violations of the Code of Conduct fairly and efficiently.
- ❖ Easor guarantees the confidentiality, and where appropriate, the anonymity of the source of suspected, or actual, non-compliance report.
- ❖ Easor guarantees the protection of source of non-compliance report according to the legislation.
- ❖ Easor regularly updates and develops the Code of Conduct to meet changing circumstances and requirements.



03

Your Responsibilities

Ethical decision making

In your daily work, if you are not sure about the ethics of your actions or decision, you can ask yourself the following five guiding questions:

- Is the activity legal? YES NO
- Does the action comply with Easor's requirements? YES NO
- Is it right and honest? YES NO
- Does the action look acceptable? YES NO
- If necessary, could the action be reported publicly? YES NO

If you answer "Yes" to each question, you are making an ethically responsible decision.

If you answer "No" to any of the questions, you should not make the decision but pause and consult depending on the situation and topic.

Employee responsibilities

1

Your responsibility, as a Easor Employee, is to know, understand and comply with the requirement set out in this Code of Conduct, as well as the company policies, procedures and standards that are the basis and support this Code of Conduct.

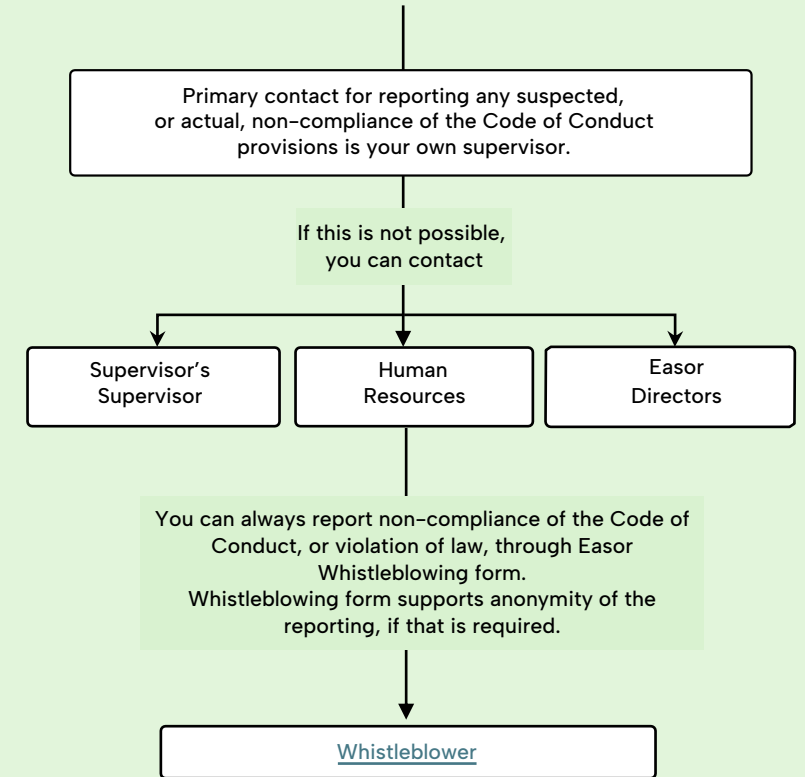
2

If you are in doubt, you must ask for more information. Many requirements in this Code of Conduct are high level and generic, and the Code of Conduct doesn't explicitly document every possible situation that you could run into.

3

If you see, or you are informed of, any actual, or suspected, action or situation where the requirements, standards or provisions of this Code of Conduct are violated, you must report it.

Instructions for reporting of non-compliance



04

Human Rights and Well-being at Work

Human rights are fundamental freedoms and rights that belong equally to all human beings. At their core is the concept of the universal equality and inviolability of human dignity. Human rights belong to everyone based on humanity and cannot be taken away or handed over. Harassment is inappropriate treatment at work that causes or is likely to cause harm or danger to the employee's health. Harassment can be, for example, mental, physical, sexual or discriminatory behaviors that violates the employee's dignity, self-esteem or work motivation.

Bullying is repeated and prolonged inappropriate treatment that violates another person's dignity, self esteem or work motivation. Bullying can be mental, physical, sexual or discriminatory behaviors that causes harm or danger to the health, work ability or work performance of another person.

Discrimination means treating a person worse than another person in a similar situation based on a reason related to the person. Discrimination can be based on, for example, age, gender, ethnic origin, religion, disability, or sexual orientation.

Occupational Hazard refers to any condition, circumstance, or situation related to a job that increases the risk of harm, injury, or illness to employees. In an office environment, this could include factors such as ergonomic issues, eye strain, or stress related to work pressure.

Principles

- ❖ We treat each other with respect.
- ❖ We have in place corporate policies, following the requirements by law, stating that all individuals are equal and should not suffer discrimination based on race, color, ethnicity, gender, age, sexual orientation, religion, political or other opinion, national, social or geographical origin, disability, property, birth or other status.
- ❖ We encourage everyone to express their concerns and experiences of harassment, bullying or discrimination.
- ❖ We follow national labor legislation and sanctions in cases of harassment, bullying and discrimination.
- ❖ We investigate thoroughly and impartially all reports of harassment, bullying or discrimination.
- ❖ We are committed to identifying and mitigating occupational hazards before they can cause harm





05

Ecology and Sustainability

Being ecological at Easor means using resources responsibly, reducing waste and promoting environmentally friendly practices. Sustainable development refers to strategies that support long-term economic success while minimizing environmental impact and promoting social responsibility.

Principles

- ❖ We are committed to developing and promoting paperless financial management processes as part of our environmental strategy.
- ❖ We are committed to promoting energy efficiency in all our activities. This includes the planning and implementation of the use of space in our premises and the daily operations of our personnel.
- ❖ We are committed to fully optimizing
- ❖ the lifespan of electronic devices by utilizing their capacity until the end of their life cycle.
- ❖ We are committed to considering
- ❖ the environmental impact of our employees' travel, enabling remote work and virtual meetings, and planning work.

06

Data Protection

Data protection means that we respect and protect the confidentiality, integrity and availability of personal data.

Principles

- ❖ We comply with laws, regulations and agreements related to data protection.
- ❖ We ensure that personal data is collected, used and stored only for lawful, appropriate and proportionate purposes.
- ❖ We inform data subjects of their rights and implement them upon request, when permitted by law.
- ❖ We are committed in continuous development and monitoring of data protection.
- ❖ We train and instruct our employees on data protection principles and practices.
- ❖ We respond to data breaches and threats efficiently and professionally.
- ❖ We require our partners and subcontractors to comply with data protection requirements.

07

Information Security

Information Security means that Easor protects information related to its business, customers and employees from unauthorized access, alteration, loss or destruction.

Principles

- ❖ We comply with laws, regulations and agreements related to information security.
- ❖ We are committed to continuous development, monitoring and auditing of information security.
- ❖ We train and instruct our employees and subcontractors on the principles and practices of information security.
- ❖ We respond to information security breaches and threats efficiently and professionally.
- ❖ We require our partners and subcontractors to comply with information security requirements.



08

Intellectual Property Rights

Intellectual property rights are the property of a company, which may consist of, for example, technology, design, brands and trade secrets. Easor respects all intellectual property rights.

Principles

- ❖ We comply with all applicable laws and regulations regarding intellectual property rights.
- ❖ We respect the intellectual property rights of others and avoid infringing them.
- ❖ We use our intellectual property rights ethically and responsibly.
- ❖ Easor reserves the right to the ideas, inventions, development work, concepts and / or projects generated during the work.

09

Anti-money Laundering and Countering the Financing of Terrorism

Anti-money laundering refers to measures aimed at preventing the legalization of criminal assets and concealment of the origin of funds. This includes actions to identify and report suspicious transactions, as well as customer due diligence procedures. Easor is committed to preventing money laundering and complying with these laws and regulations concerning the anti-money laundering and countering the financing of terrorism.

Principles

- ❖ We comply with all applicable laws and regulations regarding anti-money laundering and countering the financing of terrorism.
- ❖ We are committed to continuous development and supervision of anti-money laundering and countering the financing of terrorism activities.
- ❖ We train and instruct our employees on the principles and practices of anti-money laundering and countering the financing of terrorism.
- ❖ We monitor our customers' transactions in accordance with practices based on anti-money laundering risk assessment.
- ❖ We will launch an investigation if the customer's transactions or behaviors indicates potential illegal business activities.
- ❖ We report customer cases to the Anti-Money Laundering Authority if we detect, or suspect, illegal business activity.

10

Illegal Activities

Illegal activity refers to any activity that violates a matter prescribed by law or regulation and may damage the reputation or financial position of a company. Illegal activity is a serious offence that can lead to termination of employment, legal consequences and, possibly, criminal liability.

Principles

- ❖ We do not condone any illegal activity in our business.
- ❖ We follow national legislation and sanctions in cases of illegal activities.
- ❖ We encourage everyone to express their knowledge, or suspicion, of possible illegal activity.
- ❖ We protect employees who have made valid, or unfounded, reports about illegal activities.

11

Financial Management

Financial Management is the strategic planning, directing, monitoring, organizing, and controlling of the monetary resources in Easor.

Principles

- ❖ Financial accounting and reporting is conducted in compliance of international financial reporting standards (IFRS).
- ❖ Financial accounting and reporting is done transparently and comprehensively.
- ❖ Financial statements and reports must be accurate and free from errors.
- ❖ Financial reporting is done in a timely manner, complying with regulatory requirements.
- ❖ Financial reporting is audited continuously by 3rd party to ensure integrity of financial data.



12

Insider Trading

Insider trading is a sale or purchase transaction of a publicly traded share carried out by a party belonging to an insider in relation to the value of the share. Insiders shall not deal in a company's financial instruments if they have relevant and undisclosed information which, if made public, could influence the price of the financial instrument.

Principles

- ❖ We comply with all laws and regulations concerning insider trading.
- ❖ We follow Easor's internal guidelines and rules regarding trading in shares or other financial instruments of Easor or its publicly listed customers.
- ❖ We do not take advantage of inside information or give it to others. We do not trade in shares or other financial instruments of Easor or its publicly listed customers during prohibited periods.
- ❖ We will keep confidential any information that comes to our knowledge that, if disclosed, could influence shares or other financial instruments until it is published or otherwise becomes public.

13

Conflict of Interest

A conflict of interest is a situation where a person's own interests conflict with Easor's, or the interests of two clients of Easor conflict with each other. A conflict of interest may compromise person's impartiality, honesty and reliability.

Principles

- ❖ We avoid any conflicts of interest that could jeopardize Easor's reputation, trust or business.
- ❖ We always act in the best interests of Easor and keep it separate from our own interests or those close to us. We do not allow personal interests, relationships or interests to influence decisions or actions we take on behalf of Easor.
- ❖ We are open and honest about the conflicts of interest. We will promptly notify the relevant people if we detect or suspect a potential or actual conflict of interest in relation to our role, duties or responsibilities or those close to us inside or outside Easor.
- ❖ We also promptly notify the relevant people if we believe that the interests of one of our clients conflicts with the interests of another client of ours, and do not act in a way that could harm any of those clients.

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Corruption

Corruption refers to intentional actions in which a person or group abuses their position of power for personal gain. It may include the use of bribery or other unethical methods.

Principles

- ❖ We are committed to acting honestly, transparently and responsibly in all our business dealings. We do not tolerate corruption or bribery of any kind, nor do we allow anyone to do so on our behalf.
- ❖ We will never give or accept any valuable gift, service, payment or benefit that could influence or appear to influence our business decisions or practices.
- ❖ We will report immediately, if we detect
- ❖ or suspect corruption or bribery, by following non-compliance reporting instructions.
- ❖ We pride ourselves on acting ethically and compliant in all situations. We will never allow corruption or bribery to jeopardize our values, reputation or future.

15

Use of Company Resources

The 'Fair Use Policy' for personal use of company resources stipulates that employees may occasionally use company devices for non-work related purposes, provided it does not interfere with their professional responsibilities, violate any laws, or incur significant additional costs. This policy is subject to the understanding that such use is moderate, reasonable, and does not compromise the functioning of the organization.

Principles

- ❖ We allow employees to use company's devices for limited personal purposes according to Fair Use Policy provisions given in Easor Information Security Policy.
- ❖ The use of Easor's devices for personal purposes must not compromise the security of Easor assets, or violate the confidentiality of information, or violate Easor's internal regulations, statutory provisions, contract or legislation in force.
- ❖ The use of Easor's devices for personal purposes must not interfere with business operations, or affect productivity, or affect efficiency at work.



16

Competition Rules

Competition law prohibits mutual agreements and practices between competing companies that may restrict competition between companies. In addition, abuse of a dominant position is prohibited.

Principles

- ❖ We will avoid any action aimed at restricting competition, such as cartels or agreements with competitors.
- ❖ We do not abuse a dominant position vis-à-vis competitors, customers or service providers.

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Political Neutrality

Political Neutrality is Easor's commitment to ensure that our business decisions and actions are free from political bias or influence. It emphasizes Easor's dedication to non-discrimination and impartiality, irrespective of political affiliations or preferences.

Principles

- ❖ We are committed to maintain a politically neutral stance in all our operations and interactions.
- ❖ We are committed to ensuring that our actions and decisions are driven by business considerations and not influenced by political biases.
- ❖ We are committed to providing services without discrimination, regardless of political affiliations or preferences.

18

Public Communications

Public Communications refers to our commitment to transparency, accuracy, and respect in all communications made on behalf of the company. It underscores our responsibility to ensure that any information shared publicly aligns with our company's values and complies with applicable laws, regulations and non-disclosure requirements.

Principles

- ❖ The individuals responsible for public communications are those to whom this responsibility has been specifically assigned
- ❖ We support providing clear, accurate and accessible information to all stakeholders.
- ❖ We strive for timely information sharing to ensure that all stakeholders have access to up-to-date and relevant information.
- ❖ We respect confidentiality of sensitive information and do not disclose such information unless required by law or approved by the appropriate authority.

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Non-compliance with the Code of Conduct

Any failure to comply with this Code of Conduct may incur disciplinary actions in accordance with employment laws.

In severe cases of non-compliance of the Code of Conduct also legal actions may be applicable.

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Effective Date

Board of Directors has approved this Code of Conduct and it has entered into force on 1.1.2026.



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Thank You