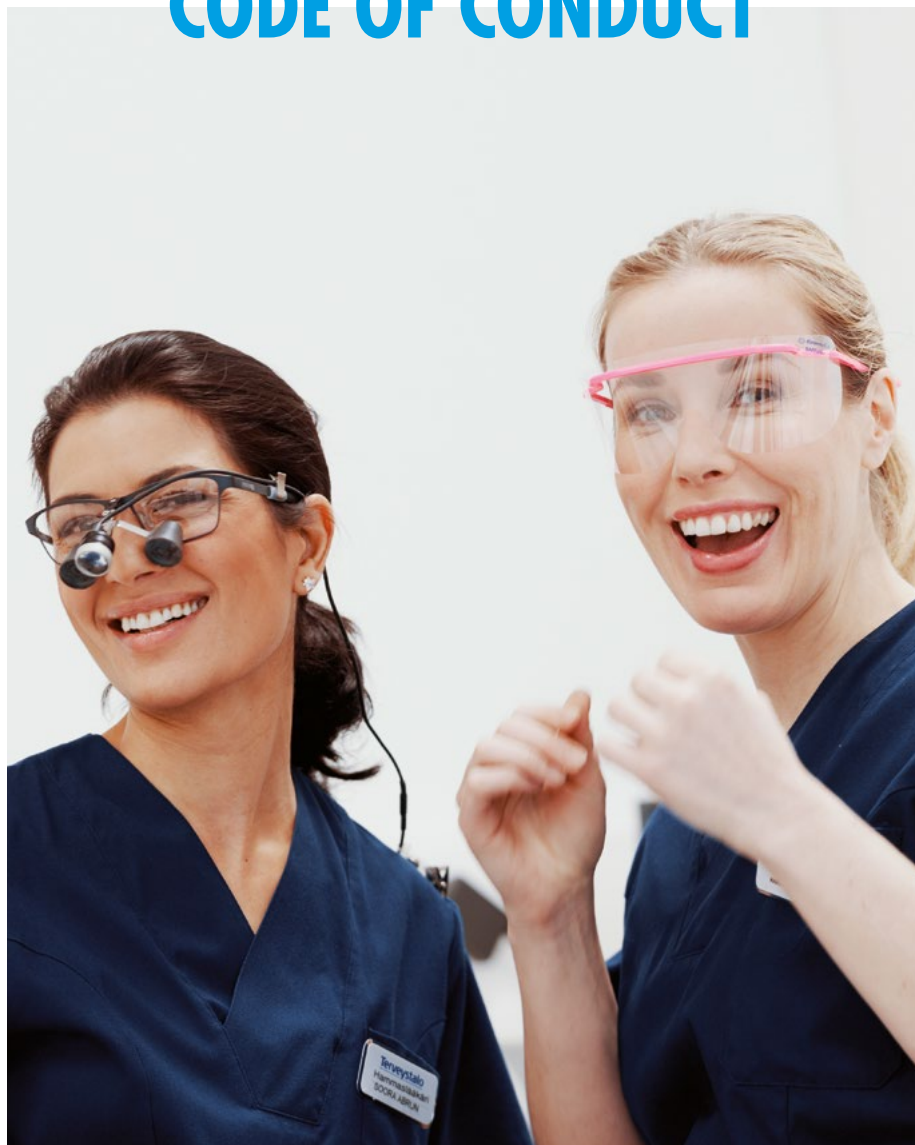


# TERVEYSTALO PLC – CODE OF CONDUCT





Process of approval:

Approved by: Terveystalo Plc Board of Directors

Date of approval: 12 December 2019

Reviewer: CEO

Written by: SVP, Legal & Compliance

# THE CODE OF CONDUCT LAYS THE FOUNDATION FOR OPERATING ACCORDING TO OUR VALUES

Terveystalo is a company with strong values operating in a value-based industry. Our corporate culture consists of strong work ethics, professionalism and goal-oriented teamwork as well as considerable effectiveness in our operations. It unites Terveystalo employees throughout the organization. The Code of Conduct supports our corporate culture and provides a framework which helps us ensure that our values, internal guidelines and laws are followed. The Code of Conduct also reflects the commitments our company has made to key stakeholders.

We need to do the right thing, regardless of where, with whom and what kind of situation we are in. Our strong work ethics, in which we do not compromise our morals under any circumstances, is the foundation of our long-term success. An important part of our culture of doing the right thing is that every person acting in Terveystalo's name can raise their concerns and count on Terveystalo to take appropriate action to remedy any violation of its Code of Conduct.

Every one of us is responsible for building an ethical culture through our own behavior and the decisions and choices we make. Therefore, each one of us must familiarize ourselves with the Code of Conduct and comply with it. Every choice matters.

Best regards,

Ville Iho  
CEO & PRESIDENT

# THE MEANING AND APPLICATION OF THE CODE OF CONDUCT

The Code of Conduct extensively describes the operating principles every employee of Terveystalo must comply with, regardless of their business unit or role in the company. We also expect our business partners to comply with the Code of Conduct. Every one obliged to comply with the Code of Conduct must ensure that they understand how the Code applies to their jobs and act accordingly.

This Code of Conduct has been written based on the values that guide our operations: know-how and caring. The Code of Conduct translates our values into principles that must always form the foundation of our daily operations and decision-making. In addition, the Code of Conduct strengthens the Terveystalo expert skills required of every Terveystalo employee.

## TERVEYSTALO EXPERT SKILLS:

### SKILLED

My professional knowhow is solid and I share my knowledge. I have the courage and will to develop and improve myself. I work towards a solution, challenging myself and networking with other experts.

### CARING

I build cooperation and trust with our experts and customers. I work in an inclusive and encouraging way and show my respect for others through my behavior.

### CUSTOMER-ORIENTED

I do everything to take care of the customer proactively, beginning with the customer's needs and ending with the best solution for the customer. I make sure that the customer is familiar with their treatment or service path. I create an easy and warm customer experience.

### PRODUCTIVE

I work in a goal-oriented way and show initiative. I achieve results in my work, both independently and together with our other experts and the customer.

### RESPONSIBLE

I take responsibility for the quality of my work. I give every customer high quality service. I also take responsibility for my work community by treating experts in the vicinity equally and by behaving in a friendly manner.

### AS AN EMPLOYEE OF TERVEYSTALO, YOU ARE EXPECTED TO:

- familiarize yourself with this Code of Conduct and comply with it.
- be transparent in your actions and decision-making.
- not to use your position, company property or contracts for your own benefit.
- raise your concerns about actions that violate the Code of Conduct and internal guidelines.
- ask your supervisor or the Legal & Compliance department for advice if you are not sure how to act.
- report any violation or suspected violations of the Code of Conduct to the Legal & Compliance department or through the anonymous [whistleblowing channel](#).

### AS A SUPERVISOR YOU ARE EXPECTED TO, IN ADDITION TO THE PREVIOUS:

- act as an example.
- reserve time to discuss the Code of Conduct with your team, especially the sections relevant to your daily work.
- promote an atmosphere in which your team members feel free to express their concerns.
- listen carefully, try to answer or seek an answer to questions and concerns related to the Code of Conduct. Ask for help if necessary.
- report any violations or suspected violations of the Code of Conduct to the Legal & Compliance department.

# RESPONSIBILITY IS THE BASIS OF OUR BUSINESS

An ethical culture and doing the right thing are an integral part of our operations, both as a company and as individuals. By making sustainable choices and doing the right thing, we strengthen our customers' trust in us, achieve success in building long-lasting partnerships and create value for our shareholders. At the same time, we make sure that Terveystalo maintains its position as an attractive workplace for people who share our ethical values.

## **1. WE COMPLY WITH THE LAWS AND PRINCIPLES OF ETHICAL BUSINESS CONDUCT**

We always operate according to the laws and regulations applicable to our business. In addition to complying with applicable legislation, we abide by generally recognized ethical standards, such as the United Nations Global Compact principles. We also expect our business partners and suppliers to share our ethical standards and to comply with them.

## **2. WE ENSURE PATIENT SAFETY AND HIGH-QUALITY TREATMENT**

Patient safety serves as the basis of the health care we deliver. We ensure it by verifying the competence and education of our employees and by continuously measuring and regularly reporting the quality and outcome of our operations. At Terveystalo high-quality professional expertise consists of the skills needed in procedures and those required when interacting with people combined with values and ethics. We are all responsible for guaranteeing uncompromised patient safety in our own work. Patient safety involves the safety of medical care delivery, pharmaceutical treatment and equipment, and common processes that we comply with consistently. These common processes and methods are described in our operations manual. The goals of our health services are to be effective, to comply with clinical practice guidelines, and to improve the positive effect on our customers' health and well-being.

## **3. WE RESPECT PRIVACY**

We respect the privacy and protection of personal data, whether it is that of employees, job seekers, business partners or customers. We collect, process and store personal data only for consented purposes in accordance with applicable laws. The implementation of data protection within Terveystalo Group is the responsibility of everyone working for Terveystalo.

## **4. WE MINIMIZE OUR NEGATIVE ENVIRONMENTAL IMPACT**

We take our environmental impact into consideration in everything we do. Every Terveystalo employee considers the potential environmental impact of their daily work and we aim to act in an environmentally friendly manner.

## RESPONSIBILITY IN COOPERATION WITH STAKEHOLDERS

Our success is based on our highly professional employees who are committed to working with the highest integrity for the best interests of patients, customers and Terveystalo in all daily situations. We believe that by creating an inclusive, equal and fair working community, we enhance the sense of relevance of our people. This is the basis for a positive employee experience.

### 5. WE SUPPORT SAFETY AND WELL-BEING AT WORK

We ensure that our employees have a safe working environment that supports their well-being. In such a work environment everyone can work to their best ability. We are all responsible for promoting safety and well-being at work. The best way to do this is to follow common instructions and to promptly report any safety or security issues. In addition to physical safety, we promote the mental health and well-being of our employees.

### 6. WE VALUE DIVERSITY

For Terveystalo, diversity comprises the unique qualities of every individual: personality, lifestyle, work experience, ethnic background, religion, gender, sexual orientation, age, nationality, skills and other characteristics. Our goal is to promote the diversity of our staff when recruiting, developing and engaging our people. We want to ensure an inclusive working environment where unique qualities are valued as strengths.

### 7. WE DO NOT DISCRIMINATE AND WE TREAT PEOPLE WITH RESPECT

We maintain a working environment in which people are appreciated and treated with respect. We do not discriminate or treat our employees or job seekers unfairly in relation to recruitment, hiring, education, promotions, salaries, compensation or other employment matters. We exercise zero tolerance with respect to sexual harassment, bullying and other forms of intimidation. We do not use or support the use of child or forced labor.

### 8. WE RESPECT OUR EMPLOYEES' FREEDOM OF ASSOCIATION

We respect the right of our employees to join and participate in the activities of trade unions or other similar representative organizations.

## MAINTAINING A COMPETITIVE ADVANTAGE

Our success depends substantially on our reputation, and we are all responsible for protecting the good reputation of our company. This is achieved when each of us takes responsibility for the choices we make and does not put personal interests before those of Terveystalo. By operating transparently and openly, we ensure that Terveystalo remains one of the best healthcare companies.

### 9. WE AVOID CONFLICTS OF INTEREST

All decisions and business transactions must be made in the best interests of Terveystalo and cannot be based on personal interests. We treat friends and relatives as any other business partners, and personal relationships with our business partners must not influence our decision-making.

We need to recognize and avoid conflicts of interest and restrain ourselves from making a decision if it includes or may include a conflict of interest. We immediately report any circumstances that may be interpreted as conflicts of interest to our supervisor and resolve the matter in the interest of the company.

### 10. WE DO NOT GIVE OR RECEIVE BRIBES

We make sure that the gifts and hospitality we give and receive always support a clear business objective and are properly recorded, reasonably valued, and appropriate to the nature of the business relationship.

Terveystalo's employees are not permitted to provide or receive any gifts or hospitality that may affect their decision-making related to business operations or that have considerable personal or financial value.

### 11. WE COMMIT TO FAIR COMPETITION

We compete honestly, fairly and in accordance with the applicable laws. All employees must comply with laws, including competition laws, regulations and internal guidelines. We respect the intellectual property and confidential information of others.

## RESPONSIBILITY TOWARDS INVESTORS

A responsible and transparent way of operating also protects shareholder value. In order to maintain our position as a reliable investment, all employees of Terveystalo are responsible for respecting the company's information and assets.

### 12. WE PROTECT THE ASSETS OF TERVEYSTALO

We all must use company resources with due care and protect them from theft, loss, damage and misuse. Our resources are physical property, such as our business premises, equipment, machinery, raw materials, finished products, vehicles and company assets. Resources also include intangible assets such as working hours, confidential information, intellectual property and data systems. We apply the same principles to the information entrusted to us by our customers, suppliers and other stakeholders.

All employees at Terveystalo must see to it that the confidentiality of business secrets, documents and internal information is maintained. Information concerning the company must not be disclosed without justified grounds or purpose.

### 13. WE DO NOT ACCEPT, ENDORSE OR SUPPORT MONEY LAUNDERING

We comply with laws and practices to prevent, detect and report money laundering, and to report any suspicious transactions.

### 14. WE COMPLY WITH INSIDER REGULATION

Terveystalo employees must not use unpublished or insider information for their own personal or financial benefit (i.e., buying or selling shares) or illegally disclose insider information to anyone. We comply with insider legislation, regulation and instructions.

### 15. WE COMMUNICATE RESPONSIBLY

We comply with high standards in financial and other communications. As a listed company, we are obliged to notify, without delay, any events that may have an impact on the company's share value.

We do not comment on any confidential or incomplete business transactions, rumors, competitors' affairs, customer relations, contracts or any customer operations without prior consent of the customer.

### 16. WE DO NOT PARTICIPATE IN POLITICAL ACTIVITIES

Terveystalo does not sponsor political parties or organizations directly or indirectly. We do not fund election campaigns of individual candidates.

# COMPLIANCE AND MONITORING OF THE CODE OF CONDUCT

The executives and managers of Terveystalo are responsible for communicating and implementing the Code of Conduct, as well as monitoring its compliance. Each Terveystalo employee is personally responsible for complying with the Code of Conduct in their daily work.

We encourage our employees to contact their supervisors, management or other persons responsible, such as the Legal & Compliance department, in unclear situations.

Any violation of the Code of Conduct or suspicion thereof must be reported to supervisors or the Legal & Compliance department, or through the [anonymous whistleblowing channel](#).

Any violation of the Code of Conduct, or failure to report a violation, may lead to disciplinary action including termination of employment. Reports made in good faith will not lead to adverse consequences for the informer. All reports made in good faith concerning violations of the Code of Conduct will be investigated thoroughly and fairly with the assistance of the appropriate internal or external party. Reports of potential violations will be processed confidentially and anonymously.

The Code of Conduct of Terveystalo has been approved by the Board of Directors of the Group. The Code of Conduct will be updated, if required.



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