

Approved by the Board of Mehiläinen Konserni Oy on 31 September 2024

## MEHILÄINEN GROUP CODE OF CONDUCT POLICY

Mehiläinen Group is one of the best known and most prestigious private health care and social service providers in Finland. Mehiläinen is an important pioneer in the social and health service industry. We base our actions on values and invest in high quality.

Mehiläinen's general code of conduct sets the operational model for all who work for Mehiläinen, for personnel and private practitioners alike. The co-operation partners of Mehiläinen must also commit themselves to complying with this code of conduct in order to work in collaboration with us.

This code of conduct shall guide actions at a general level, and it shall always be the primary action-guiding principle. More detailed policies may also have been devised on some subjects, e.g., the quality, personnel, and data security policies. The general code of conduct shall, however, always be regarded as the highest determining principle.

### Mehiläinen's Code of Conduct

1. I shall act in accordance with Mehiläinen's values. *Mehiläinen's values are: Knowledge and Skills, Caring and Taking Responsibility, Partnership and Entrepreneurship, and Growth and Development.*
2. I shall encounter the customers as individuals and in a comprehensive manner.
3. I shall perform my work tasks with the best possible quality, always prioritizing customer and patient safety.
4. I shall process customer and patient data and other personal data confidentially and with particular care.
5. I shall take environmental effects into account in my work.
6. I shall do my part to ensure the pleasantness, cleanliness, and safety of my work environment and the good atmosphere in my work community.
7. I shall treat everyone equally and respect human rights.
8. I shall communicate in an open, honest, and respectful manner.
9. I have familiarized myself with and shall commit myself to complying with Mehiläinen's general operating instructions and the instructions related to my work.
10. I have carefully familiarized myself with the laws and official regulations related to my work, and I shall follow them in my work.

## Description of the Code of Conduct

### **1. I shall act in accordance with Mehiläinen's values**

The basic task of Mehiläinen is to promote better health and well-being. My actions are guided by Mehiläinen's values, according to which my work and our services communicate:

- Knowledge and Skills
- Caring and Taking Responsibility
- Partnership and Entrepreneurship
- Growth and Development.

### **2. I shall encounter the customers as individuals and in a comprehensive manner**

I shall encounter the customer as an individual, taking their situation comprehensively into account. I shall ensure the smoothness of transactions and aim to create the best possible customer experience.

### **3. I shall perform my work tasks with the best possible quality, always prioritizing customer and patient safety**

The services of Mehiläinen are based on significant experience and expertise and on accepted care and operational practices. I shall perform high quality work in accordance with Mehiläinen's operating instructions and the laws and decrees related to my work. I shall also commit myself to the continuous development of our operations and to minimizing the related risks.

There are principles and operational policies in use at Mehiläinen to ensure customer and patient safety. I shall apply them to my work in all situations. If I observe any hazardous situations or defects concerning work, patient, or customer safety, I shall report them with a hazardous situation notification form. In urgent matters, I shall also report the matter to my superior.

### **4. I shall process customer and patient data and other personal data confidentially and with particular care**

While I work at Mehiläinen, I shall commit myself to processing customer and patient data, as well as other customer-related data possibly in our possession, confidentially and with particular care. When I process customer-related data, I shall comply with the current laws and decrees, Mehiläinen's instructions, and the accepted personal data processing practice. All persons who work at Mehiläinen shall sign a personal safety and confidentiality agreement.

**5. I shall take environmental effects into account in my work**

The basic principle of Mehiläinen's environmental goals is to identify and prevent possible undesirable effects to the environment and promote the principle of sustainability in all its operations.

Mehiläinen's environmental goals include, e.g., reducing paper use and the amount of waste, the energy efficiency of operations, and taking the environmental effects of travel into account.

I shall commit myself to environmental responsibility in my own work. I shall comply with the current environmental legislation, official regulations, and Mehiläinen's operating instructions, and I shall work in an environmentally friendly way. In my daily work, this means, e.g., that I shall use the printer prudently, minimize food and medical supply loss, act in an energy-efficient manner, and avoid unnecessary travel.

**6. I shall do my part to ensure the pleasantness, cleanliness, and safety of the work environment and a good atmosphere in my work community**

I shall commit myself to promoting the well-being and safety of my work community. I shall commit myself to the agreed operating methods, take initiative in my work and act responsibly while promoting the functionality of my work community and the pleasantness, cleanliness, and safety of the work environment.

I shall treat the members of my work community with respect, and I shall provide assistance, information, and knowledge, when necessary. I shall inform my supervisor of the development requirements related to my work and work community. Mehiläinen is a smoke-free workplace, and we have a zero tolerance policy towards workplace bullying.

**7. I shall treat everyone equally and respect human rights**

I shall treat everyone equally and respect human rights.

I shall strive to create a work environment that meets differing needs and where equal working conditions are guaranteed for all. I shall value diversity in recruiting and leadership, and I shall be responsible for ensuring that human rights are respected. I shall comply with the legislation regarding Non-Discrimination and the Equality between Women and Men, under which I am obligated to treat everyone in a fair manner. I shall act in a way that respects the values of non-discrimination by intervening in and preventing harassment. At Mehiläinen, we have a zero tolerance policy towards racism and hate speech as well as other offensive language use.

**8. I shall communicate in an open, honest, and respectful manner**

Open communication in the work community helps us to serve our customers in the best possible manner, to develop our operations and to rationalize and improve the communication between different parts of the organization.

I shall express myself and communicate in an open, honest, and timely manner both inside the organization and towards customers and co-operation partners while taking legislation and other obligations and restrictions into account. In my daily work, I shall utilize, read, search for, and provide information in a versatile manner via the communication channels offered by Mehiläinen while keeping the data security and confidentiality requirements in mind.

**9. I have familiarized myself with and shall commit myself to complying with Mehiläinen's general operating instructions and the instructions related to my work**

The quality of Mehiläinen's services and way of operating is the result of common operating methods. At Mehiläinen operating instructions and policies are defined in group-, business-, country-specific and unit-specific instructions. In addition to the operating instructions, we follow the general ethical principles and best practices in health care and social services.

I have familiarized myself with the operating instructions related to my work and Mehiläinen's administrative practices and shall commit myself to following them. In case of doubt, I shall confirm the operating instructions with my supervisor.

**10. I have carefully familiarized myself with the laws and official regulations related to my work, and I shall follow them in my work**

In all my actions, I shall comply with the laws, decrees and other official regulations that regulate our operation. I have carefully familiarized myself with the legislation and regulations related to my work to the extent provided by my work tasks.

We comply with and respect the competition legislation in all our operations. I have familiarized myself and shall comply with the binding competition legislation and other operating instructions from the point of view of my own job description. These could include, for instance, instructions and practices concerning pricing, the tender process, or supplier selection.

We forbid all forms of corruption and bribery in our operations. I shall not promise to give, offer, or accept bribes to advance my own or my company's position. I shall not use my position, information I have acquired, or assets belonging to the company to further personal interests or the interests of someone close to me. I shall comply with the legislation prohibiting bribery. By "bribe" we mean any unjust benefits that are intended to affect the recipient of the bribe. Moderate and openly given or ordinary gifts and events are not regarded as bribes. When I observe or suspect conduct that is against this code of conduct, I shall contact my own supervisor without delay.

I shall avoid situations in which my own and the company's interests are conflicted. I shall leave myself out of any decision-making situations in which I or someone close to me may have a personal interest. When I detect a possible conflict of interest, I shall contact my supervisor without delay to resolve the situation.

## The Scope of the Code of Conduct

Mehiläinen requires that each person working in Mehiläinen group and each organization collaborating with Mehiläinen abide by the principles in this code of conduct in their own operations. The code of conduct is available on the company intranet or can be made available to those requiring it in some other way. Mehiläinen does not collaborate with parties that will not commit themselves to complying with the principles in this code of conduct.

When we make procurements or otherwise collaborate with parties outside our organization, we expect our co-operation partners and contract suppliers to comply with the principles in this code of conduct and its responsibility requirements in connection with, e.g., the service subcontracting chains. In addition, our contract suppliers shall commit themselves to complying with a separate code of conduct for suppliers.

## Monitoring and Breaches

Compliance with the code of conduct is monitored with, i.a., the aid of daily managerial and supervisory work, quality audits, internal and external feedback, and other internal monitoring and inspection. A breach of the code of conduct may result in a warning or the termination or dissolution of an employment or contractual relationship and compensation of damages.

## Processing and Approval

This code of conduct and its amendments are prepared in the Mehiläinen ESG steering group, processed in the Mehiläinen Audit Committee, and approved by the Mehiläinen Board.

### Version history

Version	Changes	Status
30 October 2017		Prepared in the ESG steering group
17 December 2017		Approved by the Mehiläinen's Board
1 November 2018		Approved by the Mehiläinen Konserni's board
1 June 2021		Reviewed by Audit Committee
9 June 2021		Approved by the Mehiläinen Konserni Oy
14 November	No changes	Pending for approval
December 11, 2023		Approved by the Board of Mehiläinen Konserni Oy on December 11, 2023.
5 September 2024	Reviewed, no content changes	

31 September 2024		Approved by the Board of Mehiläinen Konserni Oy
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