

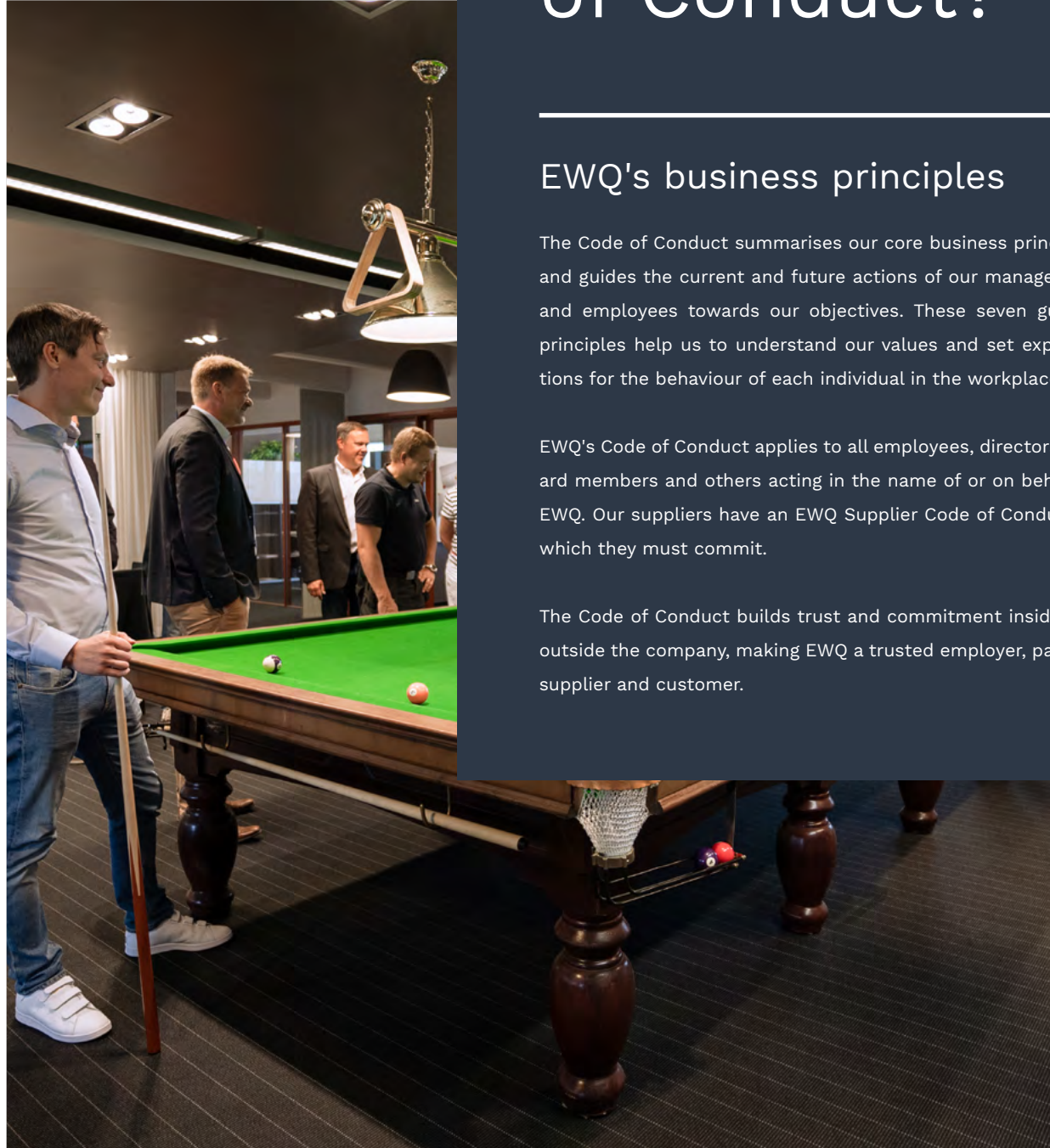
EWQ



Code of Conduct



Approved by the Board of Directors
9th of September 2023



What is Code of Conduct?

EWQ's business principles

The Code of Conduct summarises our core business principles and guides the current and future actions of our management and employees towards our objectives. These seven guiding principles help us to understand our values and set expectations for the behaviour of each individual in the workplace.

EWQ's Code of Conduct applies to all employees, directors, board members and others acting in the name of or on behalf of EWQ. Our suppliers have an EWQ Supplier Code of Conduct to which they must commit.

The Code of Conduct builds trust and commitment inside and outside the company, making EWQ a trusted employer, partner, supplier and customer.

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US, THE EWQ



We are a fully Finnish company specializing in digital in-store communication and customer management flow with long-standing and strong experience. With over twenty years of experience, we have come to be the leading Nordic provider of queue management systems. We have delivered hundreds of thousands of displays to more than ten countries, and millions of customers are funnelled through our queuing systems every day.

Domestic operations and social responsibility are the cornerstones of our business. We want to be able to offer our clients high-quality products that have been responsibly produced throughout the production chain and support Finnish work. We believe that the world's best solutions for in-store communication and customer management are created through high-quality and responsible operations.

OUR VALUES

We are guided by our values, which define our commitment to our customers, employees and other stakeholders.

- Reliability

- Sustainability

- Persistence

- Honesty

- Authenticity

Sustainability is the foundation of everything we do

For us, sustainability is not just a word in the presentation material. Everything we do is based on each of our employees taking sustainability into account in everything we do.

The cornerstones of our sustainable business are a positive customer experience, a good working atmosphere, strong trust in our partners and data protection. Our promise is to be the only truly carbon neutral player in our market. All our operations take into account the equal treatment of our counterparts and also the respect of our colleagues.

A good working atmosphere in a company is a sign of good governance, high ethics and also of respect for the environment in all company operations. We ourselves feel that we are successful as a sustainable operator when our employees are doing well and, as a result, our customers are satisfied with our work.

At EWQ, we are all committed to doing the right thing by following the EWQ Code of Conduct. Doing the right thing starts with each of us. EWQ cannot operate sustainably without our staff and stakeholders putting EWQ's values and culture of doing the right thing into practice.



SAMPO BRISK
CEO & Hed of ESG

01 WE RESPECT PEOPLE AND HUMAN RIGHTS

You can recognise a responsible operator by a good working atmosphere and well-working staff. Well-being is the key to everything and is reflected in everything the company does as a responsibility to colleagues and customers. We always put safety first in everything we do, we respect each other and we succeed together. We can only succeed if we treat everyone, both inside and outside our company, with respect.

HUMAN RIGHTS

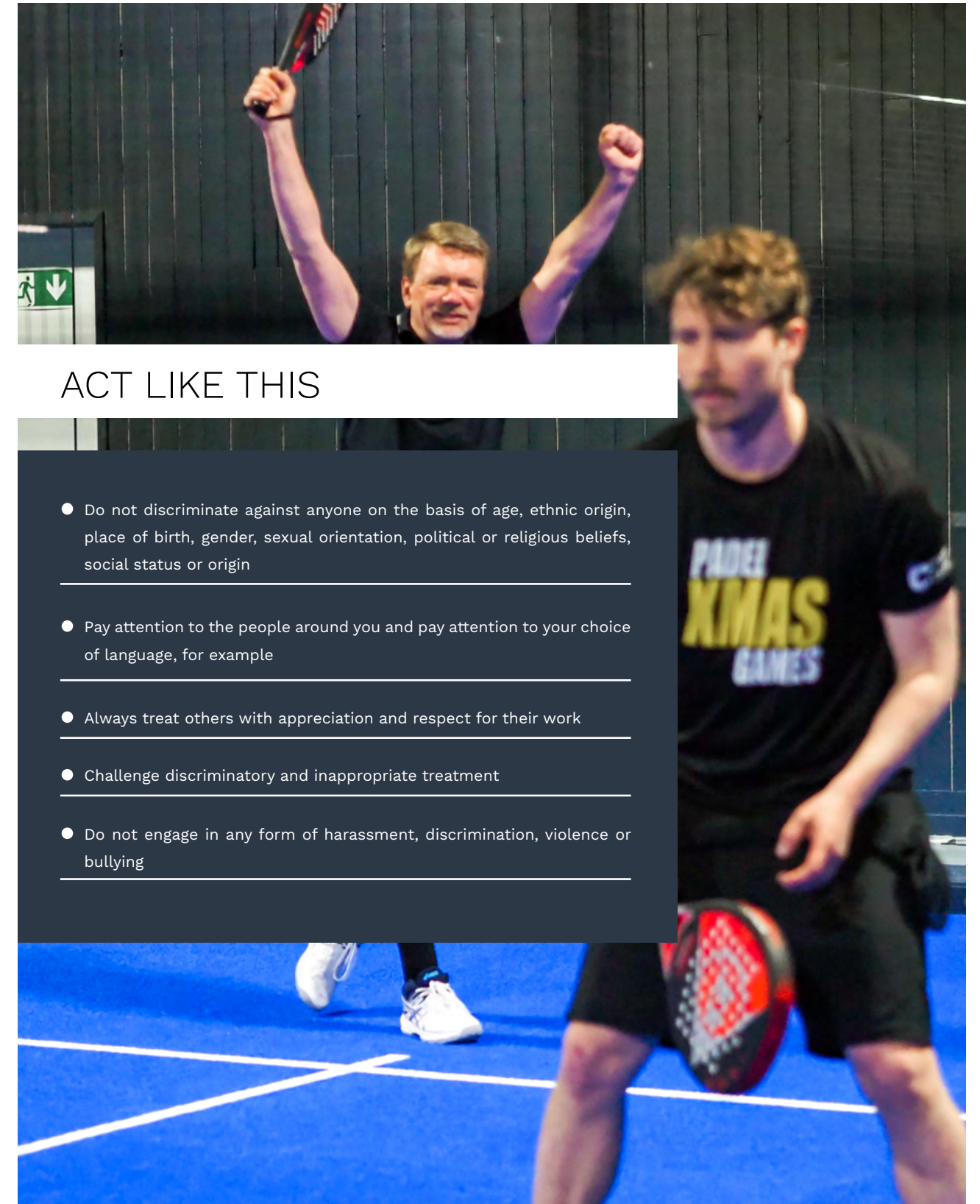
Human rights belong to everyone, and we do not tolerate human rights violations of any kind. In all our activities, we respect human rights as defined in the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We also ensure that our supply chain and our customers are committed to these principles and that there is no child labour, forced labour, human trafficking or other forms of modern slavery in our supply chain. We recognise and respect the freedom of association and the right to collective bargaining of workers.

EQUALITY

We are committed to providing an equal working environment where recruitment and development are based on an individual's own skills, experience, achievements and potential. We promote diversity and make every effort to create an inclusive culture and working environment where individuals feel safe and comfortable. We value the richness of ideas, individual perspectives and opinions of a diverse group and encourage them to be expressed. We enable equal treatment and opportunities for all, regardless of an individual's appearance, ethnic group, origin, religion or belief, gender, sexual orientation and expression, age, disability, marital or family status, or any characteristic defined by law or regulation.

HARASSMENT, ABUSE AND DISCRIMINATION

We have zero tolerance for all harassment, discrimination, violence and bullying. Any perceived grievances will be discussed in confidence with the parties concerned. EWQ employees must not discriminate in any way against anyone on the basis of race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. We do not tolerate sexual or other forms of harassment. We are all responsible for ensuring that the work environment is safe and free from discrimination and harassment.



ACT LIKE THIS

- Do not discriminate against anyone on the basis of age, ethnic origin, place of birth, gender, sexual orientation, political or religious beliefs, social status or origin
- Pay attention to the people around you and pay attention to your choice of language, for example
- Always treat others with appreciation and respect for their work
- Challenge discriminatory and inappropriate treatment
- Do not engage in any form of harassment, discrimination, violence or bullying

02 WE TAKE CARE OF EACH OTHER

Healthy employees are a prerequisite for our success and a safe working environment is the starting point for well-being at work.



SAFETY

Safe, healthy and fit-for-purpose workplaces contribute to the smooth running of work and prevent accidents and illnesses. At EWQ, one accident at work is too many and our aim is to prevent accidents. We are committed to continuous improvement of working conditions. For example, we monitor the safety of installation work and constantly follow up accidents at work and correct the causes that may lead to them. Our partners must also be aware of and comply with the applicable safety rules and practices.

OCCUPATIONAL HEALTHCARE

Every employee has the right to comprehensive occupational health. We have an action plan in place with an external occupational health provider, which includes an early support model and a Healthy Workplace model to strengthen individual work capacity and community capacity, providing a basis for maintaining work capacity and preventing disability.

ADDRESSING GRIEVANCES

We will not hesitate to address any anomalies and take corrective action if we identify situations or behaviour that compromise safety. Through good management, we ensure that working conditions promote and maintain well-being. We ensure that work demands and workloads are reasonable, that work is developmental and that people have sufficient resources to do their jobs.

03 ZERO TOLERANCE FOR CORRUPTION AND BRIBERY

EWQ is committed to ethical and moral business conduct in all its activities. Employees must refrain from any activity that may involve fraud, bribery, misappropriation or abuse of company funds, assets or services.



GIFTS AND HOSPITALITY

We do not offer or accept gifts, payments, hospitality or other benefits to outsiders to influence our decision-making. Gifts given or received must not compromise the independence of the giver or recipient.

- Our corporate gifts are worth up to 50€
- The maximum budget for customer events is 5 000€
- EWQ / clients pay for their own accommodation and travel
- If the situation requires the acceptance of a gift or benefit, the manager or the person concerned will always be informed. All benefits received or given must be duly recorded in the accounts

CORRUPTION AND BRIBERY

Corruption is the abuse of power for personal gain. Corruption includes conflicts of interest, embezzlement, bribery, extortion, fraud or favouritism towards family, friends or other close associates. We do not tolerate corruption or bribery in any form. We will never offer or pay bribes, nor will we allow bribes to be paid on our behalf to government officials or individuals, nor will we ever solicit or accept bribes.

04 WE TAKE INTO ACCOUNT ENVIRONMENTAL IMPACT AND PRODUCT SAFETY

Managing environmental impacts is a prerequisite for efficient operations and successful business. Product safety is at the heart of our product development.

ENVIRONMENT

We comply with applicable environmental regulations and strive to keep our environmental impact to a minimum. We also strive to manage our business in a sustainable and environmentally friendly way and to use natural resources responsibly. We also require our suppliers, subcontractors and other third parties to comply with environmental laws. We use 100% renewable electricity generated from water, wind, solar and bioenergy in our premises. These production methods do not increase the carbon dioxide content of the air. We regularly inform our staff about ways they can save energy consumption in the workplace and recycle properly. We use state-of-the-art equipment that is also as energy efficient as possible. The energy for our data centre in Finland is produced by a nearby bioenergy plant, which has been awarded the EKOenergia eco-label by the Finnish Association for Nature Conservation.

PRODUCT SAFETY AND RECYCLING

Our company provides customers with solutions that reduce energy consumption, reduce waste and improve inventory management and the workload associated with e-commerce collection, resulting in a substantial reduction in our customers' carbon footprint while reducing costs. We use only the best solutions in the industry as our suppliers. Our quality management ensures the safety of our products through systematic design, verification, control and continuous improvement. Our in-house 3D design and assembly allows for high quality prototypes, which are professionally tested in Pitäjänmäki, Helsinki. Our equipment has a high recycling rate and low energy consumption. Our recycling is carried out by a domestic partner with ISO14001 certification.

EWQ QUEUE MANAGEMENT SYSTEM IS A DOMESTIC KEY FLAG PRODUCT

EWQ Queue Management System has been awarded the Key Flag symbol as a sign of products manufactured in Finland and operations that employ people in Finland. For us, domesticity is one of our most important values. Domestic design and production ensure a transparent and responsible supply chain, so we can proudly stand behind our values. At the same time, we create jobs in Finland; in addition to our own employees, we employ numerous other design, production and installation professionals.



WE OFFSET OUR CARBON FOOTPRINT

We have been a carbon neutral company since 2020. To offset our annual carbon footprint, we are planting carbon sinks in Finland. We cooperate with 4H Finland in planting forests in the Taimiteko project. We are currently planting more than twice as many new seedlings as our own direct CO2 emissions each year. In this way, we want to ensure that our indirect carbon footprint is also neutralised.



PLANTING
CARBON SINKS

The trees we plant absorb around 230 000 kg of CO2 emissions, which is more than enough to cover our annual carbon footprint.



YOUTH
EMPLOYMENT

We help young people living in rural areas to find jobs and network with businesses.

05 DATA PROTECTION

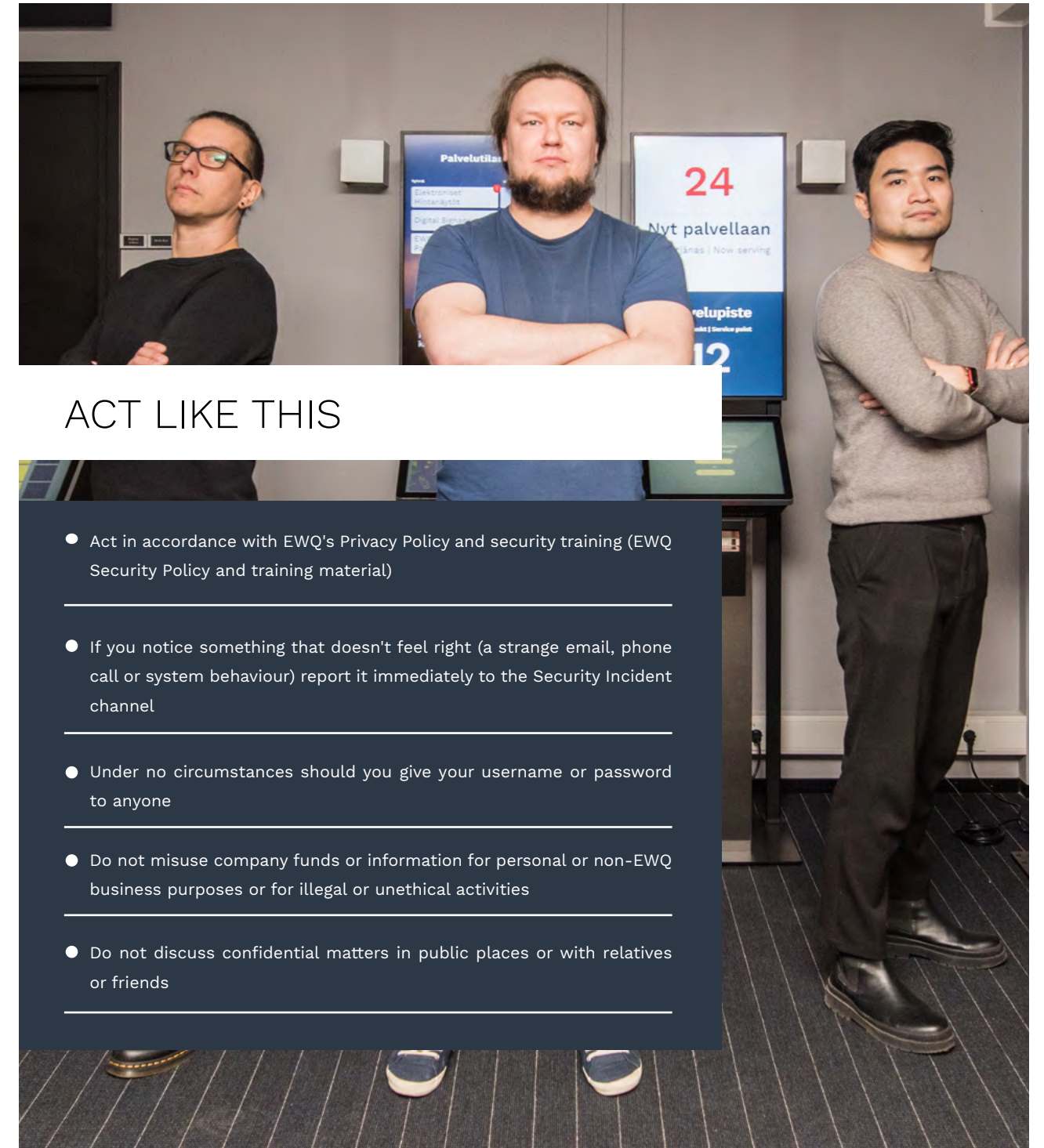
Excellent data protection is the cornerstone of trust in our business. We carefully use and protect the assets and information entrusted to us to run our business. Our data security will be audited by CGI by the end of 2023.

CONFIDENTIALITY

Due to the nature of our business, we process a huge amount of data every day. We don't take any risks in doing so, which is why our data processing is always reliable and secured by data protection. All our employees must take appropriate measures to protect their own and our business partners' confidential data. We handle confidential information with care and only share confidential information with those persons who are authorised to access it and who need it for their work.

PERSONAL DATA

We respect everyone's right to privacy. We collect, process and store personal information only for legitimate business purposes and in accordance with applicable laws. All of us who have access to personal information are responsible for handling that information with due care and protecting it from unauthorized access and use. We will delete information that is no longer needed.



ACT LIKE THIS

- Act in accordance with EWQ's Privacy Policy and security training (EWQ Security Policy and training material)
- If you notice something that doesn't feel right (a strange email, phone call or system behaviour) report it immediately to the Security Incident channel
- Under no circumstances should you give your username or password to anyone
- Do not misuse company funds or information for personal or non-EWQ business purposes or for illegal or unethical activities
- Do not discuss confidential matters in public places or with relatives or friends

06 WE KNOW OUR PARTNERS

A sustainable operator ensures its entire production chain right from the start. By knowing and developing business relationships with our customers, suppliers and other partners, we can improve business performance, security of supply and continuity. As a supplier, we take responsibility for our supply chain so that our customers can be confident that our services and products are free from the risk of, for example, finding a partner somewhere in our supply chain whose working conditions do not meet sustainability criteria. At the same time, we reduce the risk of becoming involved in illegal business and suffering losses or reputational damage as a result of such relationships.

SUSTAINABLE SUPPLY CHAIN

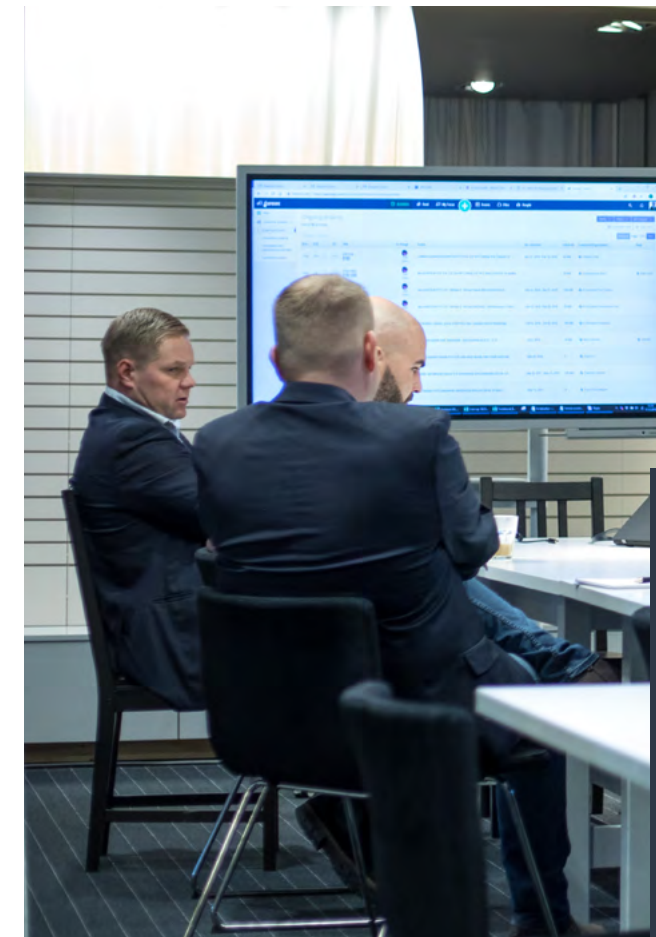
We always ensure that our business partners are corporate responsible and we seek to identify and address business risks before we start working with them. We want to maintain a high degree of domesticity in our operations, which is why we favour domestic partners. If it is not possible to choose a domestic partner, we always carry out a risk assessment and require sustainability audits for factories in high-risk countries. We also monitor our business partners throughout our relationship and carry out annual assessments and audits. In EWQ's Supplier Code of Conduct, we set requirements for our partners to ensure that they are committed to the same ethical business practices as we are, and expect companies to take these requirements into account in their supply chains.

INFLUENCING AND ENGAGING

Sustainability is closely linked to influence, and we do our part, for example in our choice of suppliers of goods and services. Sustainability is a key criterion in the selection of our partners and we want to engage them to our sustainability principles. We give our partners the opportunity to improve their processes and if any sustainability issue is identified, we will address it and initiate a process of action. If no action is taken, we will end the cooperation immediately. The most effective way to influence is always to start from your own actions and to choose like-minded partners to work with.

07 WE REPORT ISSUES OF CONCERN

We strive to maintain an atmosphere of openness and high ethics in our business. Our employees are our most important source of information for uncovering any wrongdoing that needs to be corrected. It is important that everyone at EWQ reports any suspected misconduct that is not in accordance with good principles. This gives us the opportunity to prevent or correct any misconduct.



In the first instance, we encourage you to contact one of our managers in our organisation. If you feel that you cannot share your information openly, we will give you the opportunity to raise your concerns anonymously through our Whistleblowing channel.

We will not tolerate retaliation (e.g. demotion, dismissal, denial of promotion, reduction in pay and any form of intimidation, bullying or harassment) against anyone who in good faith reports suspected wrongdoing or participates in an investigation into suspected wrongdoing.

Option 1.
Notify your own or another manager

Option 2.
Report to the EWQ's whistleblowing team:
Sampo Brisk, CEO, Head of ESG, sampo@ewq.zone
Sanni Siilin, CSR Coordinator, sanni@ewq.zone

Whistleblowing is an anonymous reporting channel for misconduct in the social context, as regulated by an EU directive. It creates a channel for a company to allow anyone to bring suspicious behaviour to the attention of the company anonymously.

THANKS FOR YOUR ENGAGEMENT



EWQ