



GRK

**THE PRINCIPLES OF
FAIR OPERATIONS**

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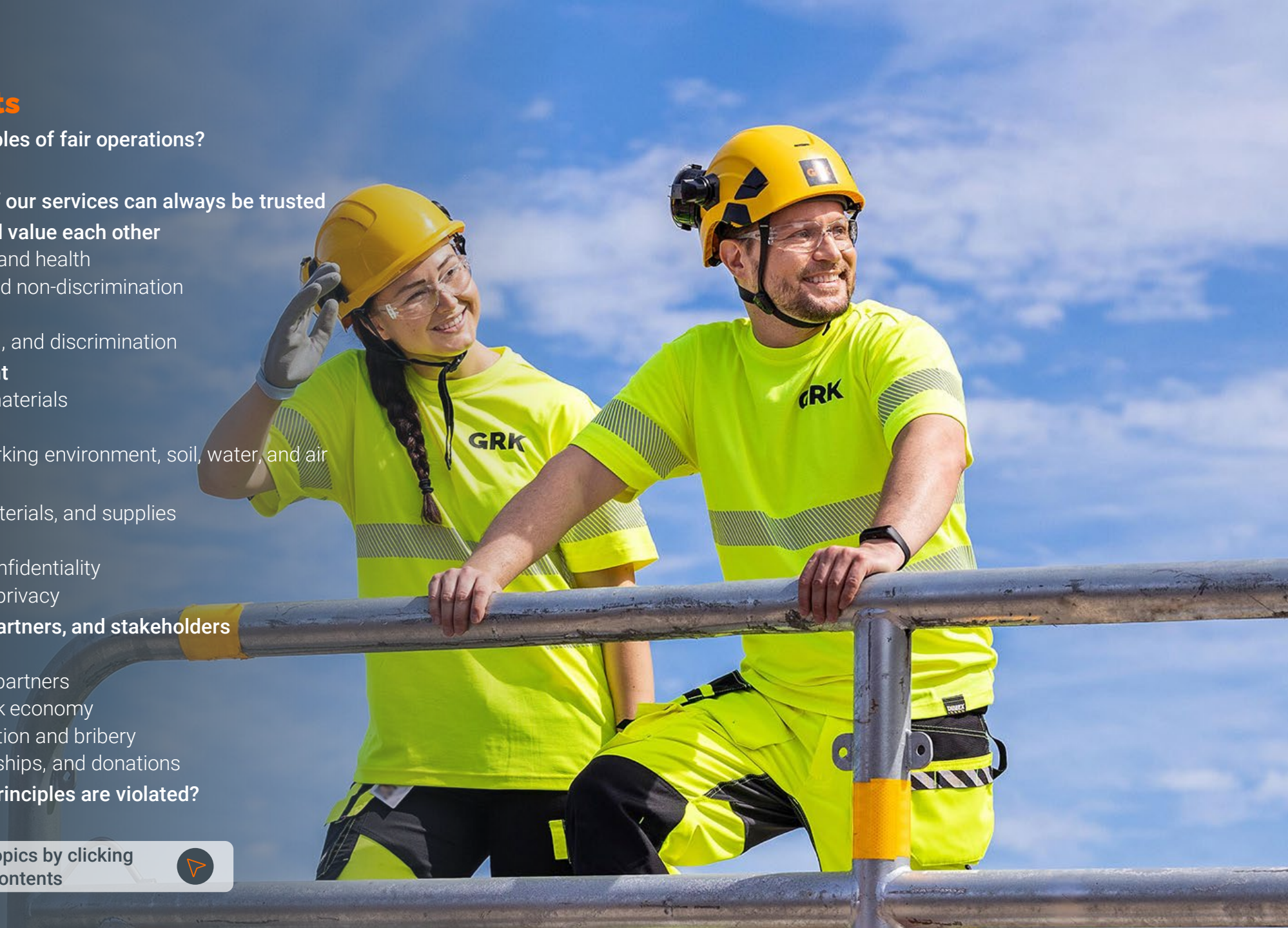
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Why do we have the principles of fair operations?

The principles of fair operations have been prepared to strengthen the growth of the GRK Group and to clarify the common rules. By acting in a fair and upright manner, we ensure sustainable growth and success not only for ourselves, but also for our customers, partners, and other stakeholders.

We have grown profitably throughout the Group's ten-year history and, still growing, we are currently the third largest infrastructure construction company in Finland. Our success is based on our skilled personnel and our strong network of partners. We act in an entrepreneurial spirit and as people who keep their word – in a bold and upright manner.

We can be trusted, and our 'we' spirit is strong.

The principles of fair operations tell our employees, management, customers, and other partners how we operate. These principles reflect our straightforward approach. We speak frankly about all matters.

Fair operations must be visible and present in the daily activities of us all. We are also proactive and take the future into account in our operations. Fair operations also guarantee the continuity of our operations.

We aim to continue our profitable growth in the coming years. We want to become a pioneer and lead the way in our field with our approach, too. Courage, straightforwardness, and fair operations have been and will continue to be the keys to our success.

The Board of Directors of GRK Infra Oyj

**WE TAKE CARE OF
PEOPLE AND VALUE
EACH OTHER.**

**WE PROTECT THE
ENVIRONMENT.**

**WE SECURE OUR
ASSETS.**

**WE VALUE OUR
CUSTOMERS,
PARTNERS, AND
STAKEHOLDERS.**



Summary

The cornerstone of the principles of fair operations consists of applicable legislation, official regulations, and our common values:

We take responsibility.

We are not afraid.

We do not waste time.

We do not just go to work.

We succeed together.

The principles of fair operations encapsulate how we act in relation to other people, customers, partners, the environment, assets, and society. The four areas of the principles of fair operations consist of the following topics:

**WE TAKE CARE OF PEOPLE
AND VALUE EACH OTHER.**

**WE PROTECT THE
ENVIRONMENT.**

WE SECURE OUR ASSETS.

**WE VALUE OUR
CUSTOMERS, PARTNERS,
AND STAKEHOLDERS.**

On the following pages, we will look at different situations that call for fair operations. The black and white areas are clear, but decision-making in the grey area is more difficult. We have not covered all possible situations in this document. In any other cases, the use of common sense is permitted. We trust that the values, the spirit of these principles, and common sense are the decisive factors in decision-making.

Find out the appropriate course of action by answering the following questions during the decision-making process:

- Is this legal?
- Is this in the company's best interest?
- Is this in line with our values and their spirit?
- Is this in line with the principles of fair operations and other internal guidelines and their spirit?
- Will my actions set a good example?
- Would I want to be treated this way?
- Could I read about my activities on the pages of a magazine or on social media?
- Would my loved ones find my actions acceptable and appropriate?

If your answer to any of the questions above is no, discuss the appropriate and fair course of action with your team or supervisor. You can always also contact GRK's General Counsel or HR Director with any questions that may arise.

If at any time in your work you encounter any activity that violates these principles, it is your responsibility to bring the matter up, in order for it to be identified and corrected.

These principles of fair operations must be followed in all Group companies. The principles are equally applicable to Board members, management, and employees, regardless of position. Our goal is also to commit our partners to these principles and to ensure that they follow similar practices in their cooperation with us.



Our word and the quality of our services can always be trusted

In all business operations, the starting point is to comply with applicable laws, regulations, internal guidelines, and agreements. This is also the starting point for us. We do not just follow the wording of laws, regulations, guidelines, and agreements, but also the spirit of them.

The principles of fair operations tell us what our values mean in our daily activities. The principles are therefore a continuation of the values, and they outline what it means for us to act appropriately and fairly.

An important guiding principle in all our operations is that our word and the quality of our services can always be trusted.



We take responsibility.

We are proud to take responsibility, whether it's about each other, our work, or the future. The results of our work can be seen for up to hundreds of years and affect the lives of thousands of people on a daily basis. Our operations ensure sustainable solutions for nature and built environment.

We are not afraid.

We do not shy away from work, challenges, or making choices. We boldly embark on new adventures, seize opportunities, and never say no to new ideas. We trust our competence. The more challenging and versatile our customer's project, the better it suits us.

We do not waste time.

The secret to our success is speed and straightforwardness – both in words and actions. We operate with an agile and productive approach. We have the courage to make decisions, matters move forward, and work gets done. For our customer, this is reflected in quick response times and smooth progress of work.

We do not just go to work.

An entrepreneurial spirit lives strong in us: we give our employees as much freedom and responsibilities as they can carry – and this applies to new professionals, too. We focus on what's important to ensure the best possible outcome. Our success is based on the continuous development and renewal of our operations. We are proud of what we do.

We succeed together.

We work closely together both inside the company and with our customers and partners. Our customers can see this cooperation as carefree projects, users can see this as functional solutions, and employees can see this as a strong team spirit.

This is what GRK stands for.



We take care of people and value each other

Occupational safety and health

For us, safety and health at work are the key to everything in ensuring that everyone gets home safe and healthy at the end of the day. This includes both physical and mental safety and health.

In everything we do, we make sure that the workplace is safe and that working does not harm anyone's physical or mental health.

MOTTO

I TAKE CARE OF THE SAFETY AND HEALTH OF MYSELF, MY COLLEAGUE, AND MY PARTNER. WE ARE A DRUG-FREE WORKPLACE.

How do I act?

- I follow safety instructions.
- I wear the personal protective equipment provided to me.
- I replace any broken personal protective equipment with new.
- I report occupational accidents and near misses immediately to the site management or supervisor.
- I share my ideas on how to improve safety.
- I take care of the health and resilience of myself, my colleague, and my partner. I inform my supervisor if I have any issues with health or resilience that disturb my work.
- I don't come in sick or under the influence of drugs.

There are fictional, but possible, situations presented from each topic. The examples are marked with this icon.

Employees at the company's bridge construction site work simultaneously on the bridge deck and under the bridge. Carpenter Kari works under the bridge and says he was lucky that the knife that fell from the bridge didn't hit him. The previous week, plumber Raiko had been hit by a hammer that fell on his foot from the bridge. The safety boots saved Raiko's instep. How do you react?



Third time's the charm! There is clearly an occupational safety risk at the construction site, and the next incident may be worse. Report these incidents to the supervisors immediately.

Project manager Riitta is the supervisor of a team. One of the members of Riitta's team sends her a text message saying that they are worried about their colleague Kari. Kari is said to be in the middle of a divorce, and he is worried about how he will survive the mortgage repayments and childcare after the divorce. The situation is already affecting his work performance, and the agreed work projects are not progressing. More than one team member is affected by this. How should Riitta act??

Caring is not embarrassing! Riitta should have a sensitive conversation about the matter with Kari. The team member's care for Kari is exemplary, and Riitta thanks the team member for bringing the matter to her attention.



Fairness, equality, and non-discrimination

We have a supportive work community. We give constructive and positive feedback. We value the work our colleagues do.

We treat everyone equally and fairly. This applies to colleagues, but also to customers and partners.

The treatment of others must in no way be influenced by, for example, their gender, age, nationality, language, origin, religion, sexual orientation, trade union activity, political participation, or state of health. This applies to all circumstances and regardless of whether the individual is our employee, customer, partner, or CEO.

MOTTO

I TREAT EVERYONE EQUALLY AND FAIRLY.

How do I act?

- I treat everyone equally and fairly in accordance with collective agreements.
- When recruiting employees, I don't discriminate against anyone.
- When arranging work tasks or offering promotions or development tasks, I don't discriminate against anyone.
- The various benefits and responsibilities are the same and accessible to everyone.
- Everyone has the right to family leave, and we encourage taking it.
- We may sometimes use harsh language, but I never speak or behave disrespectfully or degradingly. This applies to all situations and events, as well as social media. I ensure that my personal views cannot be interpreted as official positions of the company.

During the lunch break, your colleague Raiko complains about not having received a personal salary increase for several years, even though he has achieved his goals every year. Raiko says that the only reason for this is his foreign background. How do you advise Raiko in this situation?



No one should be discriminated against because of their nationality or any other personal feature. Suggest that Raiko discusses the matter with his supervisor or HR.

A group of students, including both women and men, is visiting the construction site. Project manager Risto shows them around and says that the work is physically so heavy that "women can't do it". You are involved in the visit because you work at the construction site. How do you react to Risto's words??

You interrupt Risto by telling the group that this is definitely not what we think. You say that women are just as capable of the work as men, it's the attitude that counts!



Labour rights

We comply with labour legislation and collective agreements. Working hours, wages, holidays, and benefits are, in principle, determined by collective agreements or local legislation. We pay the same wages for the same job. We also expect our partners to adhere to the same principles.

Naturally, our employees have the right to join trade unions. Through our own actions and example, we promote a good dialogue with employee representatives.

MOTTO

WORKING LIFE MUST BE FAIR AND IN ACCORDANCE WITH THE LAW FOR EVERYONE.

How do I act?

- When I'm hiring new personnel, I ensure that the same work results in the right amount of pay.
- I ensure that the employment contract has been concluded in writing.
- I have the right to belong or not to belong to a trade union, and it does not affect my wages or benefits, or the way I'm treated in the company.
- If I hear of a violation of labour legislation or the terms of employment, I will immediately notify my supervisor or HR.

You stop by the office on Sunday evening to pick up a file for the site meeting on Monday. You run into cleaner Pille at the office. Pille complains that her employer does not pay her the Sunday allowances she is entitled to. How do you react?



Pille's employer does not seem to be complying with the legislation on pay. Notify your supervisor or the person in charge of the procurement of the cleaning service.

A new team of subcontractors, including employees from Ukraine, has arrived at the construction site. During a coffee break, you talk to one of the employees, Bogdan, and you learn that he has been in Finland for a long time and has not been home for months. You learn that Bogdan's employer has taken possession of his passport and promised to return it when the agreed work is done. How do you react?

Inform HR immediately. The confiscation of a passport is a deprivation of liberty and strictly prohibited in all circumstances.



Harassment, bullying, and discrimination

For us, workplace safety and health also mean that we do not harass, bully, or discriminate against anyone.

By harassment, discrimination, and bullying, we mean any activity that can be dangerous or harmful to another person. Harassment, discrimination, and bullying can be physical, mental, verbal, or non-verbal. It can also occur in the form of gestures and facial expressions. It may be intentional or unintentional. What counts, however, is how the person who is being harassed experiences the behaviour, not what is intended by it.

MOTTO

**WE DO NOT TOLERATE HARASSMENT,
BULLYING, OR DISCRIMINATION!**

How do I act?

- I stop to listen when someone tells me about being harassed, bullied, or discriminated against.
- As a supervisor, I ensure that I do not ignore competent persons due to a personal feature.
- I understand that actions, words, facial expressions, and gestures can offend or hurt others. I do not offend or hurt others.
- I understand that I am setting an example to others through my actions. I set a good example.

Raiko has recently started work and he is doing well. However, some of the team members behave strangely when people outside the team are present. At those times, these teammates talk to others about Raiko as a “rookie who can’t do anything yet” and exclude him from discussions. You are one of the team members and you notice that Raiko is clearly upset about the situation. How do you act?



Bring the matter up with the team. Bullying Raiko should be stopped early on. If the situation does not improve, encourage Raiko to report the situation to his supervisor. You can also bring the matter to your supervisor’s attention yourself.

Riitta has frequently asked Pentti for a coffee or dinner outside working hours. Riitta often touches Pentti’s waist in passing, as if by accident. Pentti has refused the invitations and finds this touching uncomfortable. How do you advise Pentti?

Tell Pentti that he doesn’t have to tolerate being harassed by Riitta. Suggest that Pentti speaks frankly to Riitta about the matter, and if the improper behaviour continues, reports it to Riitta’s supervisor or directly to HR.



We protect the environment

Sustainable use of materials

The construction industry is a major source of emissions, and a large part of the emissions are generated by the use of raw materials, materials, and energy. The aim is to use as little energy as possible and to replace raw materials and materials with renewable alternatives where possible.

We promote circular economy thinking and, at the same time, mitigate climate change through resource efficiency.

MOTTO

THE COST-EFFECTIVE USE OF RAW MATERIALS, MATERIALS, AND ENERGY IS ESSENTIAL FOR THE ENVIRONMENT. RESOURCE EFFICIENCY ALSO MAKES SENSE FROM AN ECONOMICAL POINT OF VIEW.

How do I act?

- Each of us is responsible for developing the sustainable use of materials in order to minimize material loss.
- I use energy sparingly. I turn off work machines when they are not in use, and I use materials sparingly.
- I discuss renewable materials with the customer and suggest their use in tendering processes.

A tunnel construction site is about to be completed, and more than three half-coils of cable have been left over from the construction site. As a project manager, you're wondering what you should do with the cable reels. There is probably not enough room in the warehouse for them, so you think you'd better throw the coils in the skip. Could there be a better solution for this?



There will surely be a use for undamaged cable at another site. Find out if there is a possibility to store cables pending future use. In the future, care must be taken to ensure that a new cable reel is not used until the previous reel has been used.



It's a sunny summer day. You notice that the operator leaves the excavator running on the site during the coffee break. This habit irritates you, particularly as you know that it doesn't take much energy to restart the machine. How do you act?

You mention the matter to the operator. You ask them to turn the excavator off in the future during breaks, in order to reduce emissions and fuel costs.



Waste management

Our operations generate waste. Materials that cannot be reused are recycled correctly. We exercise particular caution when handling hazardous waste. Waste materials do not belong in nature.

We have the environmental management system ISO 14001:2015 in place, which guides us to take the correct actions.

MOTTO

WASTE DOES NOT BELONG IN NATURE. I RECYCLE AND SORT WASTE CORRECTLY AND SAFELY.

How do I act?

- I familiarize myself with the environmental management system and guidelines.
- I strive to reduce the amount of waste by planning the work stages and selecting materials that will produce as little waste as possible.
- I handle waste and chemicals with care. I follow the instructions given for the storage and disposal of waste.
- If I notice any errors in the handling of waste, or that waste has been thrown into the environment, I will intervene and rectify the situation.

Asphalt waste has been left over from a road construction site. Asphalt waste has usually been taken to a licensed site after the work has been completed at the construction site. You're wondering how asphalt waste could be reused.



Inform our circular economy specialist or environmental manager about the situation. It is likely that a reuse will be found for this waste batch as well.



Hazardous chemicals are used at the construction site. You notice that the chemicals are not put into the containers reserved for them at the end of the working day; instead, they are left at the construction site. How do you act?

Leaving chemicals on site may pose a risk to both people and the environment. Bring the issue up with the supervisors, in order for the correct approach to be adopted. Talk about the matter with your colleagues, as well, and set an example to them by handling chemicals carefully and according to the instructions.



Protection of the working environment, soil, water, and air

We use the environmental management system ISO 14001:2015 to help us protect soil, water, and air. This means, in essence, that no substances or emissions are released into soil, water, or air that do not belong there. We also aim to reduce noise and vibration, protecting the working environment and residents in the surrounding areas.

Emissions into soil, water, and air pollute the environment and cause health hazards. This is not what we want for ourselves, nor for the next generation.

MOTTO

WE ENSURE THE PROTECTION OF THE WORKING ENVIRONMENT, SOIL, WATER, AND AIR.

How do I act?

- I handle materials carefully and take care not to allow them to enter the soil, water, or air.
- If environmental damage occurs despite caution, I will take appropriate control measures and report the incident to my supervisor and the authorities immediately.
- A large share of emissions is generated in transport. I try to reduce unnecessary driving and plan my day's routes in such a way that unnecessary driving is kept to a minimum.

You notice that oil is leaking from an excavator onto the ground at the construction site. The operator of the machine has not noticed the leak. How do you act?



Intervene immediately and tell the operator to turn off the machine. In addition to engine failure, leakage may cause environmental damage, and immediate action must be taken to prevent such damage. Report the incident to the site manager. Ask the machine operator to investigate the cause of the leak and to have the machine repaired immediately.



Residents in the neighbourhood in which our bridge site is located have been complaining about loud noise at the site, which does not subside even at weekends. The neighbourhood's complaint states that the city's environmental protection regulations require noise to be avoided between 10 p.m. and 7 a.m. and at weekends. You are the site manager for the site. How do you react?

Make sure that you have a noise permit for the work and that the neighbourhood has been informed of it. Contact the neighbourhood's representative and apologise for the noise disturbance. Ensure that the neighbourhood is regularly and adequately informed about the progress of the construction site. Keep your word.



We secure our assets

Work equipment, materials, and supplies

Our assets include all equipment, materials, and supplies. These include, for example, vehicles, tools, materials, and computers. The assets must be used for the company's operations. Personal purchases shall not be made at the employer's expense.

The assets are used carefully and in accordance with instructions. When used improperly, machinery or equipment can cause danger to life. However, damage to the assets may occur. Damage is reported promptly, and it shall not be concealed.


When a project is completed, the tools and materials are returned to the right place, and no items are stashed. The same applies if the employment relationship is terminated, so that the employee returns any company assets in their possession.

MOTTO


**OUR ASSETS ARE USED FOR THE
COMPANY'S OPERATIONS, AND THEY ARE
TAKEN CARE OF.**

How do I act?

- I use the assets carefully and for the company's operations. This also applies to the use of a customer's or partner's assets.
- I ensure that assets are not stolen, intentionally damaged, or misused.
- If I borrow the company's assets for my own purposes, I will agree on it in advance. I understand that, in this case, I am responsible for the borrowed assets as if they were my own.

There is a person lift in use at the construction site. You are currently in the process of painting the exterior of your detached house. You're wondering whether you could borrow the person lift for the weekend. No one needs it at the site over the weekend, right. 

Borrowing a person lift involves many risk factors, and insurance is not valid when the lift is used for personal purposes. It is recommended to borrow a lift from an equipment rental company for the weekend.

 You act as a construction manager and notice that the door of the office booth at the construction site is open. You look inside and see that there is no one in the booth, but four computers on the table are turned on.

Discuss the situation with the employees at the site. Open office booths on site attract thieves, and in addition to computers, the thieves may end up getting their hands on the contents of the computers, trade secrets, and access to information systems.



Conflicts of interest

A conflict of interest arises when there is a conflict between personal interest and the company's interest. In practice, conflicts of interest may occur if there is a relative or close friend on the other side of the table. In this case, personal interest may override the interest of the company.


The best way to deal with a conflict of interest situation is to recuse yourself, meaning that you withdraw from the role of the decision-maker or from other participation in the situation. In the event of a conflict of interest, you may think that your activities are not affected by a family relationship or friendship. However, the situation may look different to the outside world, and that is exactly what it is more important to consider.

MOTTO


IN ALL DECISION-MAKING AND OPERATIONS, I AM PRIMARILY CONCERNED WITH THE INTERESTS OF THE COMPANY. IF NECESSARY, AND AT A LOW THRESHOLD, I RECUSE MYSELF FROM DECISION-MAKING.

How do I act?

- If I notice a clear conflict of interest or suspect one in any situation, I bring the issue up, whether it is me or another person around the table.
- I inform my supervisor on my own initiative if a project involves a party in which my relative or close friend exercises decision-making power.
- When working, I always act in the company's interest, and I do not compete with the company, for example, by taking a secondary job or establishing a company in the same field without prior permission.

Your eldest child has just turned 17, and it's time to apply for a summer job. You are responsible for three construction sites, and you're wondering whether you could find a summer job for your child at these sites, either through us or through our partners. 

Hiring your child is not an option for us because they are underage, and you are also disqualified to hire your own child. Our partners must also follow the legislation on the recruitment of minors and hiring your child can be problematic due to the cooperation relationship.

 You have worked for several years and have gained experience in project planning tasks. Your work performance is good, and you think that you could do project planning for construction companies as a side activity. The tools are already at your disposal due to your employment relationship with our company.

Activities that clearly compete with the company's operations are prohibited. Secondary jobs and companies are allowed, if the activities are not competitive, if you don't use the company's assets or your working hours for the side activities, and if they do not interfere with the performance of your regular work. In any case, ensure a permit for a secondary activity with your supervisor.

Data security and confidentiality

Valuable business information includes financial information, business ideas, plans, processes, and working methods, as well as tender and project information. Confidential information also includes information related to personnel, customers, subcontractors, and suppliers. A good rule of thumb is that any information other than that available on the company's public website is confidential.


Valuable and confidential business information is used with care and exclusively to promote the company's business.

MOTTO


**INFORMATION AND TRADE SECRETS ARE
IMPORTANT ASSETS THAT ARE WELL
TAKEN CARE OF.**

How do I act?

- I follow the company's data security guidelines and report suspected misuse of information.
- Through my own actions, I ensure that confidential information does not fall into the wrong hands.
- I make sure that the computers I am carrying are turned off when I am not using them and that printed materials are not left lying around where people outside the company could get their hands on them.
- I do not ask new employees or customers for information about competitors.
- If I receive confidential information inadvertently, I will notify the sender, and I will not use the information for any purpose.

Your friend is coming over this weekend. Your plan is to reminisce about the holiday trip that you and your friend's families took the previous summer. Your friend brings the holiday photos with them on a flash drive and suggests that they upload the photos to your computer. Your personal computer is being serviced, but your company computer is ready on the corner of your desk, waiting for the photos to be uploaded. 

You should never insert outsiders' flash drives into a company computer. The flash drive can be infected with malware, or it can even be used to download trade secrets. You must find another way to look at the photos.

 You accidentally receive a message from a competitor intended for a customer, and it includes price information for a project. The customer is your namesake, which is why the error has occurred. You know that this information was not intended for you or any of your colleagues' eyes.

Immediately notify the sender of the wrong address and destroy the message you received. It is also a good idea to inform the CEO.



Data protection and privacy

A large amount of personal information is processed in the company's operations. Personal information can relate to employees, customers, or partners. Personal information includes all information related to the identification of an individual, such as their name, contact details, health information, photos, personal identification number, and tax number.

We ensure that personal data is processed, collected, registered, and used to the extent permitted by law and only to the extent that personal information is needed. Personal information will also be appropriately deleted if the situation so requires.

MOTTO

**WE ALL HAVE THE RIGHT TO PRIVACY,
INCLUDING AT CONSTRUCTION SITES AND
WORKPLACES. THAT IS WHY THE
PROTECTION OF PERSONAL INFORMATION
IS IMPORTANT.**

How do I act?

- I only process and review personal information that I have access to and that I need for my work.
- If I have the right to process personal information, I take care of the protection and confidentiality of that information.
- I ensure that only persons with the right to access personal information are able to access it at any time.
- I respect others' privacy and do not pry into or request personal information that has nothing to do with me.

You are preparing a site plan and ask HR to provide the address information of certain employees for planning purposes. You also ask HR to add the employees' birth dates to the sheet. What should you think about this?



Both address information and dates of birth are personal information. There must always be a justified reason for processing them. In this situation, asking for information on the employees' localities may be justified in order to select employees who live as close to the site as possible. The age of the employees should not have any effect on the planning, which is why HR should refuse to provide the birth dates.

You are responsible for three sites, and the site manager for one of them asks you for detailed information about the other two sites (including employee information). You have a busy week and are wondering if IT could provide access to the systems from which the site manager could get the information they want.

You must first verify what information the site manager has the right to access. Regarding personal information, it is very likely that there is no right. Providing access to the systems is a quick solution, but it requires ensuring that access rights are not too extensive, particularly when it comes to personal information.



We value our customers, partners, and stakeholders

Fair competition

The purpose of competition laws is to prevent the restriction or distortion of free competition. This is related to sensitive information such as pricing and cost and project information. Laws also regulate the operations of a dominant company. Competition laws must be strictly adhered to, not least because the financial consequences of breaching the laws are significant.

Competition laws must be considered when dealing with competitors, industry associations, customers, and partners.

MOTTO

IT IS IMPORTANT FOR US TO COMPLY WITH COMPETITION LEGISLATION THAT ENSURES FAIR AND FREE COMPETITION IN THE MARKET.

How do I act?

- When communicating with competitors, I am cautious of what I can discuss. This applies to both work and leisure time.
- I am also careful when participating in the activities of industry associations and the like because competitors often sit around the same table.

It's the weekend, and you are at a party. A project manager working for a competitor is at the same party. By the punch bowl, the representative of the competitor, who is already slightly tipsy, starts talking about a tendering process in which we are involved. You feel uncomfortable when you can't stop the competitor's flow of words.



Leave the situation immediately. Inform your supervisor of the conversation first thing the next working day.

A competitor is involved in an infrastructure project, and you participate in the project negotiations as a representative of the company. After the negotiations, you find that the competitor's representative has left their notebook in the conference room. How do you act?

Clearly the contents of the notebook are none of your business. Contact the owner of the notebook and let them know that the notebook has been left behind. Also inform the supervisor so that they can assess your participation in further negotiations if there is a suspicion that you have gained access to competitor information.



Procurements from partners

We procure large amounts of goods and services for business purposes. It is essential that the principles of fair operations are fully applicable to our partners, as well. This means that we expect from our partners what we expect from our own operations. On the other hand, this also means that we treat our partners honestly, fairly, and well.

All subcontractors, consultants, and intermediaries who provide services to us are considered partners. These principles also apply to material and tool suppliers.

MOTTO

RELIABLE AND GOOD PARTNERS ARE IMPORTANT TO US. WE STRIVE FOR LASTING AND LONG-TERM PARTNERSHIPS. WHEN IT COMES TO PROCURING MATERIALS AND TOOLS, WE MAKE SUSTAINABLE CHOICES.

How do I act?

- When choosing a partner, I act fairly and honestly.
- I cannot be bribed.
- I make sure that my partner is committed to the principles of fair operations.
- I treat our partners in the same way that I treat colleagues and customers.
- I agree on the tasks and responsibilities with the partner clearly. I do not impose any additional obligations and responsibilities on the partner without new negotiations and compensation.
- I do not push for extended terms of payment when dealing with partners.

Competitive tendering for the subcontracting of a contract is in progress, and at the same time, the World Ice Hockey Championships are underway in Tampere. One of the tender participants sends the project manager two tickets for the games in the preliminary rounds. The tender participant is supposed to present their activities and the related new innovations before the game.



Immediately inform the sender of the ticket package that you cannot accept it.



An entrepreneur operating the excavator at the construction site is grumbling that their contracting partner has stretched the payment term. The contracting partner requires a term of payment of 60 days, which is too long for the excavator operator. They ask if you could discuss the matter with the contracting partner, as you are both in the same supply chain.

In business-to-business transactions, the maximum term of payment of 30 days allowed by law should be used. Talk to the partner and say that they are also expected to use the maximum term of payment of 30 days.



Combating the black economy

The term 'black economy' refers to measures taken to avoid statutory charges and obligations. The black economy includes undeclared work, violation of a business prohibition, employment pension insurance fraud, workplace discrimination, and the use of unauthorised foreign labour. Another area of the black economy is cooperation with partners who do not take care of complying with the law.

In practice, the black economy includes violation of a business prohibition, employment pension insurance fraud, workplace discrimination, and the use of unauthorised foreign labour.

We know our partners, and we carry out the necessary background checks for new partners.

MOTTO

**FOR OUR PART, WE PREVENT FINANCIAL
CRIME AND THE BLACK ECONOMY BY
COMPLYING WITH THE LAW.**

How do I act?

- All work and procurements are always paid by bank transfer, never in cash.
- I pay attention to unusual and complex payment arrangements and ensure that they are correct. If necessary, I will require further clarification from the other party.
- I always examine the background and financial information of new partners, in accordance with the contractor's obligations and liability guidelines.

A small construction company contacts you and says that it wants to be involved in our projects. The prices offered by the company sound very competitive to you, and the company representative explains that the good price is due to foreign workers who are used to low wages.



A deal that sounds too good should always set alarm bells ringing. The background of the new partner should be examined before resuming the conversation. It is also a good idea to remind the company representative of the salary level and collective agreements in Finland.

You have concluded an agreement with a partner (a Finnish company), and you receive the first invoice. The recipient of the invoice is the partner in question, but the account number does not match that indicated in the contract, and the account details indicate that the account is with a Cypriot bank.

Ask the partner to explain why the payment should be directed to a Cypriot bank account. Try to verify the correct holder of the account indicated on the invoice.



Prevention of corruption and bribery

Corruption means any form of abuse of power for personal gain. Bribery is one of the most flagrant forms of corruption. We recognise corruption as one of the key risk areas, because we operate in the construction sector and in cooperation with the public sector.

Corruption can be difficult to identify, particularly in Finland, because it is structural and something that has been regarded as an established custom over time.

Representation and hospitality can easily slide towards corruption, and in such situations, it is always a good idea to think about what the representation and hospitality activities look like on the outside.

MOTTO

**WE HAVE ZERO TOLERANCE FOR BRIBERY
AND CORRUPTION.**

How do I act?

- Normal hospitality is part of business operations. I avoid excessive and repetitive hospitality.
- Normal hospitality should be avoided while competitive tendering is in progress (the company being either the recipient or provider of tenders).
- I never accept or give away money, gift cards, or other items easily convertible to cash.
- All forms of bribery, whether accepted or given, are strictly prohibited.

Your task is to select the partners for an infrastructure contract. You're currently building a pier at your summer cottage and think that this could be a good opportunity to get a work sample from the partner.



We are talking about corruption here, because building your own cottage pier is for your own benefit, and the partner could agree to do it in the hope of a bigger project. Forget the idea.



A contract has been successfully completed, and you're wondering how the successful project could be celebrated together with the customer, which is an operator in the public sector. The hunting season is about to begin, and you know that the representative of the customer representative is an avid hunter. You're planning a short hunting trip to North Karelia with the customer.

When dealing with the public sector, particular caution must be exercised in terms of expressions of gratitude and hospitality. In any case, check the instructions on acceptable hospitality for the customer in question.



Influencing, sponsorships, and donations

Business operations include properly conducted influencing and lobbying. For example, it is important for us to be involved in the activities of the industry association and to foster good cooperation with the communities living near construction sites.

Nevertheless, we do not engage in politics as a company. That is why we will refrain from any support for political activity. Naturally, each of our employees can take part in political activities in their spare time and must not be discriminated against.


With sponsorships and donations to various activities, we can participate in the development of society. The sponsorship targets are selected annually, ensuring that they support the company's strategy and promote these principles.

MOTTO


AS A COMPANY, WE DO NOT ENGAGE IN POLITICAL ACTIVITIES. DONATIONS AND SPONSORSHIPS NOT RELATED TO BUSINESS ARE DECIDED ON ANNUALLY BY THE MANAGEMENT.

How do I act?

- Political activity is not promoted in the company's operations. In leisure time, political participation is allowed.
- I do not discriminate against a colleague, partner, or customer because of their political orientation.
- I refer support and sponsorship requests not related to business to the management.

Your neighbour is a nominated candidate in the municipal elections. They ask you if they could organise an election event in the company's premises and if the CEO would be willing to give a small speech at the event. 

You let your neighbour know that this is unfortunately not an option. As a company, we refrain from any political activity.

 A representative of a customer municipality calls you and tells you that, due to the tight financial situation of the municipality, its sports clubs are in trouble. The representative of the municipality wants to know if we would be willing to sponsor a local football club. You know that the children of the representative of the municipality play at the club in question.

Tell them that the sponsorship targets are decided annually, and that the management will decide on the activities to be supported. Also note that the definition of corruption can easily be met in such a situation.



What should I do if these principles are violated?

It is the duty of each of us to intervene if these principles of fair operations are violated. We encourage everyone to report any abuse or improper treatment at a low threshold to either their supervisor or the CEO.

Our Group has an anonymous reporting channel through which violations of the principles can be reported.

Suspected violations shall be investigated appropriately and confidentially. During the investigation, it shall be ensured that any person reporting a violation in good faith is protected.

In addition, we always encourage you to share any development ideas that we can use to improve our operations.





GRK