

Code of Conduct

For internal use and Siili Auto's partners

Foreword

Siiili Auto creates a better tomorrow by combining human needs, technology and sustainability. Our shared value is responsibility, which helps our employees, reach their goals. The foundation for responsibility is laid by adherence to the Code of Conduct.

Each employee of the Siiili Auto must comply with this Code of Conduct. Our subcontractors and other partners must also follow this Code or a similar set of terms.

Adhering to the Code of Conduct will help us realize our purpose, which is to be the best community for our customers, employees and entrepreneurs to learn, grow and create sustainable value.

Siiili Auto regularly provides training for its employees in matters related to the Code of Conduct.

Siiii's Code of Conduct is attached. It describes our way of working.

This Code of Conduct concerns the companies that belong to the same Group as Siiii Solutions Plc, as well as all the employees and partners of these companies.

As a Siiii, I comply with all applicable legislation and ethically sustainable operating models

Siiii has operations in several countries. We comply with and respect local laws and regulations. We are honest and just in everything we do. We take responsibility for all our ventures. Every Siiii employee complies with the laws, regulations and ethical norms as well as other guidelines defined by Siiii, which are applicable to their field of work.

Equality, non-discrimination and a safe work environment

We treat everyone as an equal and don't tolerate discrimination of any kind. We promote equality.

We seek to ensure a work environment with no harassment, inappropriate behavior or abuse. Siiii condemns sexual and all other types of psychological or physical harassment. Siiii provides a work environment where people can work safely and efficiently towards reaching their goals. Each Siiii is responsible for creating a safe place to work for others.

We respect human rights and do not use child labor

We respect internationally recognized human rights in all that we do and advance their realization. Siiii does not use child labor. The employees of Siiii can decide whether they want to belong to a labor union or a similar representative organization. Siiii must not prevent its staff from using their right to choose their political views.

We avoid conflicts of interest

Work must be carried out without regard to self-interest or the interest of friends or family members. When doing business with our friends and family, we treat them like any other business partner, and our decision making isn't affected by any personal relationship we may have with them. We report any situation that could potentially be interpreted as a conflict of interest by following the guidelines given below.

We do not give or receive bribes or support dishonest activities, and we believe in fair competition

We want Siili's clients and other partners to trust the company and the services it provides.

Members of Siili staff are not permitted to give or receive any gifts that would influence Siili's business decisions or that are of considerable personal nominal or monetary value. Siili will not offer inappropriate financial incentives to any representative of an authority with the intention of promoting business or some other interest of the Group.

A Siili employee may give or receive only occasional token gifts or business-related hospitality of low value as long as these don't result in obligations or expectations of returning any favors to the person giving or receiving the gift or hospitality.

As a Siili employee, I will not work in a way that supports the dishonest conduct of others. This includes activities such as embezzlement, blackmailing, theft and fraud, tax fraud, submitting misleading financial statements, forging data or propositions, deception and breach of trust in order to gain an unfair or unlawful advantage for Siili or other parties, such as Siili's clients.

As a Siili employee or as a partner of Siili, I will not tolerate any type of bribery, corruption or fraudulent activity.

Siili is an honest competitor and complies with marketing and competition legislation. We believe in fair competition and support the advancement of fair competition by adhering to laws and regulations. Our goal is to provide our clients and partners with reliable services by acting in accordance with the guidelines of our clients and partners as well as with local legislation. If we notice any operational models that do not comply with competition legislation, we will take immediate action. We do not discuss sensitive issues (e.g. prices, strategy or clients) with our competitors.

Siili will make business-related decisions in a way that promotes the company's competitiveness and that is financially sound and appropriate.

Environmental work is on every Siili's responsibility

Siili is committed to acting according to the principles of sustainable development and to preventing and reducing harm to the environment. We comply with existing environmental legislation and regulations of public authorities. We strive to minimize our environmental burden.

We also take environmental aspects into consideration in our facilities, acquisitions and invitations to tender.

Data security, data protection and confidentiality

Siili provides a reliable and secure service for its clients. Siili manages its processes and services by using appropriate and integrated security related operational models. Security is very important to us, and we expect Siili personnel and partners to take safety matters into consideration.

Siili is committed to protecting the privacy of its clients, employees and other stakeholders and to complying with applicable privacy and data protection laws and regulations. Respecting privacy is an essential part of our business operations and company culture. We always handle personal data with care and process personal data in a transparent way.

As a Siili employee, I will keep any information related to the operations of the business, staff, clients or partners confidential and will not disclose this information to anyone apart from those concerned.

Communication and insider regulations

Siili's communication is timely, open, direct and honest. As a Siili employee, I will not act in a way that will harm Siili's reputation or its success in business. As a listed company, Siili is obligated to comply with insider regulations.

How does Siili monitor compliance with the Code of Conduct, and how can I report abuse?

Siili monitors compliance with these guidelines. Our goal is to promote adherence to these principles in the operations of our partners as well. The Management Team of Siili is responsible for communicating the principles of these guidelines to the employees. The superiors' job is to ensure that the principles are understood and complied with.

Failing to comply with and breaching of Siili's Code of Conduct may result in disciplinary action. In such case, Siili may, for example, terminate the contract of an employee or end the business relationship with a partner.

Breach of the Code of Conduct is reported to the superior, to Siili's legal services or to <https://report.whistleb.com/en/siilisolutions>. Suspected abuse or breaches will be investigated and resolved confidentially. Siili employees will not suffer any negative contractual consequences for reporting abuse or breach.

The Siili Code of Conduct has been approved by the Board of Directors of Siili Solutions Plc. The guidelines are updated as needed.

//////////

Originally accepted by Siili's Board of Directors on 16 December, 2019.

Accepted and adapted by Siili Auto on 17 December, 2019

Minor changes accepted by the Chairman of the Board of Directors on 30 March 2021 based on the Board's authorization on 16 December 2019.