

VTT's Code of Conduct

beyond the obvious

Dear colleague,

With the commitments stated in the VTT Code of Conduct, we wish to explicitly highlight the significance of responsible and ethical business.

Our strategy puts emphasis on VTT's role as a growth partner through technology for its customers and society. Together with our customers and partners we solve challenging questions and develop innovations via applied research. It is essential that all our stakeholders can trust our compliance not only with laws and regulations but also with the highest ethical norms. We also expect our partners to commit to our Code of Conduct.

VTT's Code of Conduct is a key component in our compliance programme. We all are committed to it. VTT has a well-earned reputation of being a reliable and responsible partner. Culture builds on individual, everyday actions and decisions. This covers the quality and reliability of the research results, the way we interact with our partners, paying special attention to occupational safety and environmental issues etc. Remember that if in doubt – ask first!

Every action counts.

Antti Vasara
President & CEO



Our values

- Respect
- Together
- Passion
- Forerunner

Ethical norms

- Impartiality
- Reliability
- Integrity
- Responsibility

VTT's Code of Conduct

Sustainable foundation

- We comply with all laws and regulations applicable to VTT
- We conscientiously use public funds and act in accordance with the Procurement Act
- Common interest guides our decision-making – not the personal benefit
- Absolute opposition to corruption
- We apply high ethical standards in research
- We do not make compromises in safety

Thriving professionals

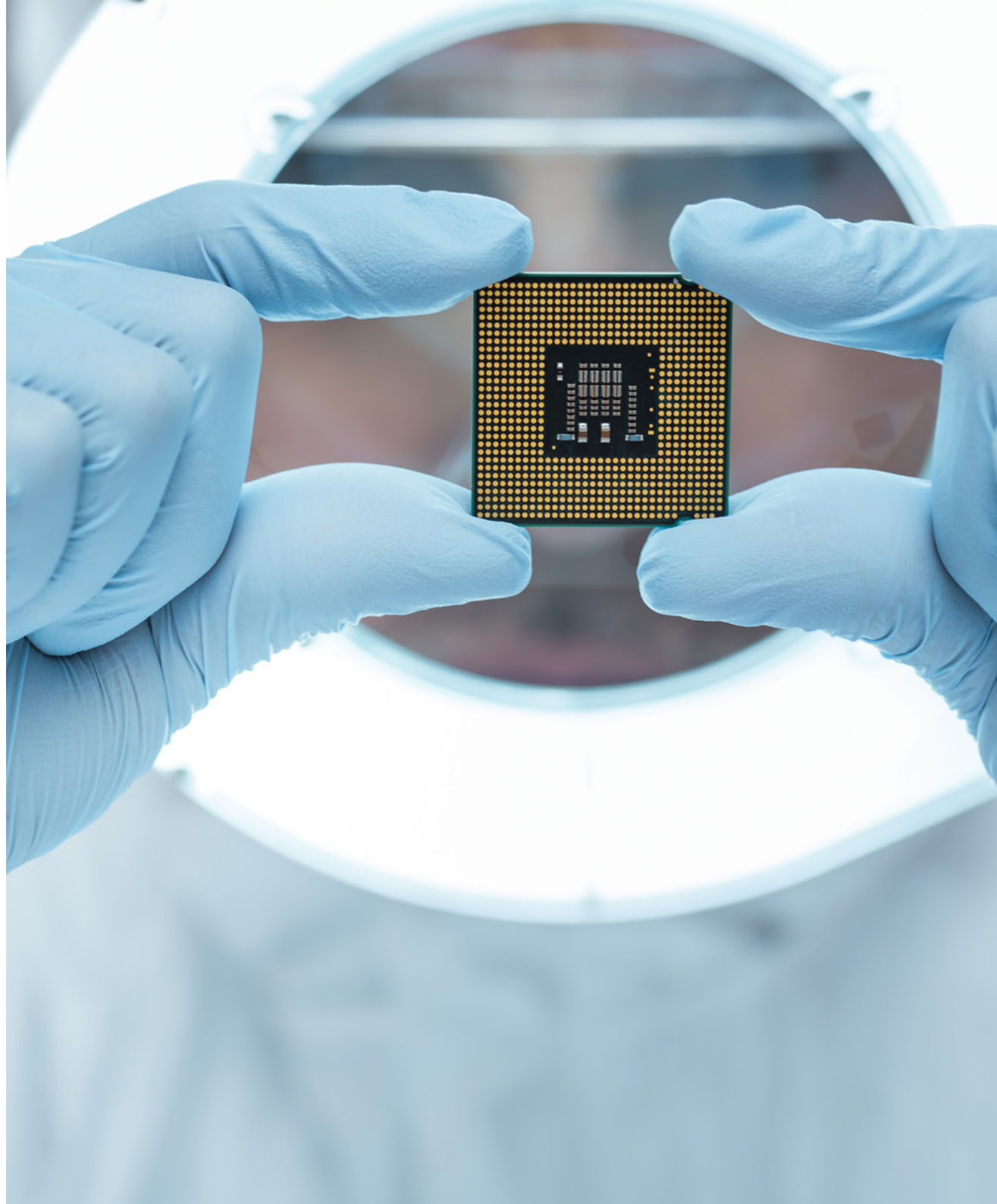
- A fair working community
- Our staff is our most important resource

Empowered customers

- We take care of assets and information

Resilient society

- Through our activities, we promote sustainable development and biodiversity
- We communicate openly
- We speak up





Corporate responsibility is at the core of all VTT operations

We are an all-around sustainable company from environmental, societal and financial points of view. Impeccable ethical principles – impartiality, reliability, integrity and responsibility – form a solid basis for our research and business. All our operations are continuously developed, and we evaluate our actions critically.

VTT is a state owned, not-for-profit limited liability company and we operate under the mandate of the Ministry of Employment and Economy. VTT's operations are regulated by the Act on VTT Technical Research Centre of Finland Ltd.

Laws and regulations set the minimum requirement for all of our operations. In addition to these there are voluntary commitments and standards which we comply with. We follow good business practices and require that from our suppliers & service providers.

Responsible conduct of research applies to all our activities. VTT's operations and organisation are conducted in a transparent manner. VTT communicates its expertise and the impact of its technologies openly and actively.

VTT is compliant with the Finnish Corporate Governance Code for listed companies with certain deviations as explained in VTT's Corporate Governance. When procuring services, we comply with the applicable public procurement legislation and our internal procurement guidelines. VTT is certified with ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.

Obedying laws and regulations is a common responsibility for everyone in VTT. If in doubt consult your line manager, the Legal Function or Compliance Officer.

We conscientiously use public funds and act in accordance with the Procurement Act

In external and internal accounting and reporting, we make sure that commercial activities are separated from non-commercial activities in a transparent manner. No subvention or misuse of governmental grant of any kind is allowed.

VTT is committed to complying with such international trade controls and anti-terrorism, anti-bribery and anti-money laundering laws. Dual use of technology is one of the main topics to take care of appropriately.

We arrange the financial management process in a controlled, cost-effective, optimal and effective manner with a view to serving the interests of the whole VTT Group. Issues related to cash flow, capital and risk management are considered in all economic decision-making. The management of VTT and its subsidiaries ensure that financially sound principles are followed in all operations and decisions.



Remember

- Get familiar with pricing principles; finance experts and nominated salespersons will assist you.
- Government grant is used in research activities either in jointly funded or self-funded projects.
- Pay attention to possible trade control regulations and other risks that could arise when doing domestic and international business.

” Careful and responsible



Remember

- Do not take an outside job which might restrict your duties at VTT.
- All statements should be based on objective research results within your area of expertise. Official statements – for instance replies to requests by officials, ministries, or other public administration's requests for statement – are signed according to "Approval rights at VTT" document.

Common interest guides our decision-making

A conflict of interest arises when the private interests of a person conflict with the interests of VTT. We pay special attention to conflicts of interest and seek to ensure that the persons making decisions have no vested interest in the matters decided upon. VTT's employees must make decisions in accordance with VTT's best interests and not their personal interests.

Organisational autonomy has been ensured by separating tasks that require impartiality and independency. Autonomy in decision-making has been ensured by internal instruction; Approval rights at VTT. Operational autonomy has been ensured by defining tasks of persons participating

in operations as well as qualifications and assessments.

Transparency of financial relations has been ensured by separating accounts of non-commercial and commercial activities within VTT parent company's bookkeeping, and by individual balance sheets and income statements of the VTT Group's companies.

**” Take care of
VTT's interest**

Absolute opposition to corruption

VTT does not accept any form of corruption or fraud. VTT's personnel may not claim, approve or accept any financial compensation or other benefit that could affect their ability to perform their jobs objectively and impartially. Accepting bribes is prohibited under penalty. All types of corruption and bribery are prohibited, and all the necessary measures are taken in order to prevent them.

Offering or receiving gifts and invitations are to be carefully considered. Their value should not exceed what can be considered as a reasonable hospitality. Also make sure that it is not done repeatedly with same persons or organisations.

The most important thing is to prevent corruption in advance. It is important that everyone strives to identify and prevent corruption in their own environment. However, if the abuse has already occurred, report it to your line manager, Compliance Officer or file a report of suspected misconduct in the Whistleblower channel as soon as possible so that corrective action can be taken immediately.



Remember

- Talk regularly what kind of corruption risks your environment has.
- Attempt to influence with wrong means is already considered as bribery – even without actual influencing takes place.
- Never offer cash or any equivalent of it.
- Gift or hospitality should be given and received openly showing that there is nothing to hide.
- If you encounter an attempt of bribery or other wrong mean of influencing, immediately inform you line manager and Legal Function or Compliance Officer.

” Even attempt to influence in a wrong way can be considered bribery

We apply high ethical standards in research

Our ethical norms are based on impartiality, reliability, integrity and responsibility. The ethical norms stress the importance of following good practices and lay the foundation for sincere, reliable and confidential cooperation with customers and partners and among VTT's personnel.

In our research operations, we follow national and international guidelines for good scientific principles (RCR, Responsible conduct of research), and the management of breaches of said principles. Actions that are against good research practices, such as presentation of invented or falsified results or plagiarism, are unacceptable. Quoting from another work without citing the source is against good research practices. We support and promote open science research practices, based on which the researchers draw up and document their research carefully and according to good practices. The results and interpretation of the research is published openly and transparently, while taking confidentiality into consideration.

Animal testing is not performed by the VTT. However, sometimes VTT

participates in cooperation projects, where the project includes animal testing by other research cooperation parties. VTT actively develops alternative research methods and processes, in particular technologies based on in vitro cell cultures. If alternative methods cannot be used, VTT ensures that the party responsible for the animal testing follows the respective laws and other statutes on laboratory animals and that the animals are treated according to the said laws and statutes.

Gene technology research of VTT is based on research methods and processes, where safety and ethicality are ensured. VTT uses micro-organisms modified by gene technology and cultured plant and animal cells in closed laboratory environments and does not perform field testing.

” Research ethics are not compromised



Remember

- Make sure that you include correct names as writers to a publication – no additional names e.g., based on position nor neglecting anyone with reasonable contribution.
- Follow RCR guidelines.
- Always inform your line manager if you suspect that ethical principles are violated in research and related activities and if necessary, report a violation of good scientific practice in accordance with the good scientific principles guidelines of the Finnish National Board on Research Integrity (TENK).



Remember

- Make sure that you are familiar with the safety and emergency procedures. Inform also our service providers and other partners about safety and emergency procedures inside VTT's premises.
- If the work practices are new to you, ask guidance from colleagues, project manager or superiors.
- Act and report immediately when you notice something compromising safety.
- Always inform the VTT safety control room, which is open 24/7, of any threatening situations or emergencies.

We do not make compromises in safety

VTT requires a high level of safety in all its operations. As a result, our objectives regarding occupational safety are the following:

- The development and continuous improvement of occupational safety activities is part of our strategic and operative planning.
- VTT has the target of zero accidents which also means no occupational diseases, no harassment and no burnouts.
- Work at VTT is motivating and the individual's functional ability, resources and development needs are taken into account (physical, psychological and social loading).
- It is safe for people to work at VTT's facilities.

Nuclear and radiation safety is always our top priority, and this policy is communicated to our personnel. We ensure sufficient financial and human resources for taking care of the safety and support the competence development of the people responsible for the safety. We encourage the personnel to freely bring out all safety observations. We enhance our safety culture in a target-oriented systematic manner, taking into account the principles of continuous development.

VTT's personnel has a duty to act according to the safety and security guidelines. The necessary safety and security processes are included in the contracts concluded with the cooperation partners. VTT's or its cooperation partner's personnel are obliged to inform their respective line manager and VTT's Occupational Health and Safety Manager, Security Manager or Information Security Manager on any lack, threat or fault in safety and security. The contingency plan describes the procedures applicable in state of emergency. VTT complies with the ISO 45001: 2018 standard in its operations.

The aim of our security measures is to ensure uninterrupted operations and protect our personnel, property, information, premises and the environment from accidents, damage and crime under all circumstances. We take into consideration national and international security policy programmes and other strategic objectives.

” Safety is everyone's common agenda

A fair working community

We cherish the diversity, equality and inclusion of our experts in our work community. We believe that people's diverse backgrounds and experiences create an innovative growth platform where the entire organisation can grow.

We support universal human rights within our sphere of influence. We do not accept the use of child labour or any forms of forced labour. We expect a similar commitment from our partners.

In our recruitment and employment, we comply with applicable employment and labour laws and regulations. VTT's aim is that all open vacancies are published internally and/or externally. The selection is based on competence and education required as well as suitability to the job. The compensation is based on job requirements and performance in it.

We do not accept any discrimination against employees on the basis of age, gender, origin, sexual orientation, political activity or any other reason. We strive for equality between genders at VTT and do

not tolerate any form of harassment in the workplace. Our Equality Plan consists of targets, actions and measurements to promote equality. We provide our personnel with equal and fair opportunities in work and support them in balancing work and private life.

To confirm fair and equal treatment couples or persons who have a close relationship comparable to a familial relationship cannot be in a supervisor-subordinate relation. In such cases supervisor-subordinate relation will be dismantled by job rotation or other appropriate manner.

**” At VTT,
everyone
can be
themselves**



Remember

- Respect and support your colleagues.
- If you notice any harassment don't just walk away. Tell your manager about the harassment or report a suspected occupational health and safety violation.

Our staff is our most important resource

Our aim is to ensure the competence, motivation and well-being of the personnel and a healthy work environment. We believe that every individual should be treated with respect and dignity.

VTT's aim is that we all appreciate each other's involvement in the work community so that everyone's creativity and expertise is appreciated. Participation systems and the way in which work is organised make it possible for the personnel to influence their work. Expertise is developed with a view to fostering international standards of

expertise, scientific competence and customers' success. The expectations placed on the personnel are realistic and challenging. VTT's target is to have a capacity of personnel expertise and competence in efficient use.

Active caring is a common way of working for the whole work community, with the aim of promoting common wellbeing and preventing problems and absences. It is the responsibility of every VTT employee to highlight issues that are observed in the work community. The line manager's job is to find out and take things forward if necessary.



” **Our expectations are both realistic and challenging**

Remember

- Your well-being matters. Take care of yourself and your colleagues.



We take care of assets and information

We use and maintain all VTT's assets – funds, properties, facilities, equipment, Intellectual Property Rights etc. – carefully and solely on business purposes.

The aim of our security measures is to ensure uninterrupted operations and protect our personnel, property, information, premises and the environment from accidents, damage and crime under all circumstances. We take into consideration national and international security policy programmes and other strategic objectives.

We pay special attention to data security, in which the aim is to protect the data from out-siders (confidentiality and secrecy), to prevent unauthorised changes in data (integrity), to guarantee the availability of the data and to ensure the uninterrupted operation of VTT's IT systems in abnormal conditions.

VTT respects all privacy laws and regulations. When collecting and processing personal data, we do so with care and diligence and by respecting our commitments with our clients. We only collect, use and store personal data which is necessary for our operations.

Our security policy, safety management principles, and risk and continuity management policy define the guidelines for our safety management.

Our customers and partners are very important to us, and we always safeguard the confidentiality of information. We do not disclose confidential information of our customers to outsiders, and we handle such information with care. We do not publish the results of our assignments, unless they are a matter of public record, or the customer has given the consent to publish them. We respect any contractual and legal requirements on confidentiality as well as our applicable internal policies.

VTT values its Intellectual Property Rights and protects and develops its IPR efficiently in accordance with its internal policies. We seek to further develop our core technologies in order to be a leading world-class research organisation. We offer patent rights and other IPR for purchase or licensing. Our technologies may also be used in the launch of new spin-offs or joint ventures. VTT's IPR is commercialised at a market price.

Remember

- Take cybersecurity issues seriously. Use secure means when handling, storing and transmitting confidential information.
- Don't leave your mobile phone or laptop unattended. When travelling in high-risk areas do not carry devices containing sensitive information with you at all.
- Customer confidentiality is the corner stone of our business – respect that always.
- Make promptly an invention disclosure when you have discovered a novel and inventive technical solution.
- Report immediately if there is a threat towards VTT's assets or you notice e.g., malfunctioning or defects of any kind.

Through our activities, we promote sustainable development

At the core of VTT's sustainability is the sustainability and effectiveness of the solutions we develop. The goal is to have a positive handprint to ensure that solutions really improve the world, not just minimise side effects.

The key points of our environmental policy are:

- We create sustainable solutions for major societal challenges in our research projects.
- We support our customers in innovations that enhance environmental performance.
- We encourage our personnel towards sustainable choices.
- We comply with the statutory requirements and other binding obligations of our operations.
- We preserve biodiversity.
- We continuously improve our management system to enhance environmental performance.

Our research choices support the UN Sustainable Development Goals, SDGs. VTT's projects are most closely linked to the following SDG goals: SDG 3 Good health and well-being, SDG 7 Affordable and clean energy, SDG 9 Sustainable industry, innovation and infrastructure, SDG 11 Sustainable cities and communities, SDG 12 Responsible consumption and SDG 13 Climate action.

VTT's goal is to be carbon neutral by 2030. To this end, a development programme has been launched, in which a carbon neutrality roadmap with concrete measures and timetables will be prepared for VTT. In this way, we ensure that the choices we make genuinely reduce absolute greenhouse gas emissions.

In procurement we favour products with lower impact on environment when feasible. Our research choices contribute to the conservation of biodiversity.

We report on corporate responsibility applying the Global Reporting Initiative (GRI) guidelines. VTT is ISO 14001 certified.



Remember

- When planning a project, consider the environmental effects of the anticipated outcome.
- Be careful in experimental work not to create unnecessary burden to environment. Use risk analysis to evaluate the critical topics.
- Use teleconferencing instead of travelling when feasible.

We communicate openly

We believe in open communication and share information about our activities and results. However, we respect confidential information and keep the customer and our trade secrets confidential.

We encourage VTT employees to be professionally visible on social media and to take advantage of the opportunities offered by social media to report on work, research and results, and to strengthen their own expert profile. VTT employees are also free to use social media in their expert role in their own profiles, but an account set up separately around the research topic or project must be connected to VTT's communications. The same communication guidelines apply on social media, for example, with regard to confidentiality or opinion rights, as elsewhere in communication.

You can read the principles of communication on [our website](#).



” We encourage VTTers to be professionally visible on social media



” Do what is right!

Remember

- Learn the Code of Conduct and act accordingly.
- Report on suspicions e.g., by using the Whistleblower channel.
- If in doubt consult your line manager, Legal Function or Compliance Officer

We speak up

It is important that we all act in accordance with VTT's values and this Code of Conduct. If you notice or suspect any abuse, report it to the appropriate channels.

In addition to a line manager, suspicions about abuses and actions in breach of VTT's guidelines can be reported to VTT's Compliance Officer or an Internal Auditor through the Whistleblower channel. You can report to the Whistleblower channel via VTT's Intranet or VTT's external web page.

You can report anonymously but reporting in your own name makes sure the accuracy, efficiency, and fairness of the related investigation.

All reasonable cases that are reported will be investigated in the appropriate manner, regardless of the issue. Reporting abuses will lead to no negative consequences for the whistleblower. Suspected abuses will be investigated

in confidence; only those parties who are necessary to investigating the matter and taking the related measures will be informed.

After the completion of the investigation, VTT's management will decide on the possible consequences of abuses, or repercussions for those found guilty of non-compliance with its guidelines. Notifications, their investigations and the measures taken are regularly summarized for the audit committee of VTT's board.

The task of the Ethics Committee is to promote and support the observance of good scientific practice in the VTT Group and to take a position on research ethics questions presented to it. Suspicions related to good scientific practice should always be reported in your own name. Each business area has a research ethics support person who can be contacted for all research ethics issues.

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