



CODE OF CONDUCT



A SHARED CODE OF CONDUCT FORMS THE BASIS FOR RESPONSIBLE AND SUSTAINABLE ACTIVITIES

Pihlajalinna helps to live a better life. We offer high-quality social, health and well-being services at our private clinics, hospitals, fitness centres and housing services across Finland.

Our work is important, responsible and sustainable. Our daily choices ensure that our activities are in line with the rules and the shared values of Pihlajalinna professionals.

Pihlajalinna's Code of Conduct describes our ways of complying with the rules and our values. The Code of Conduct applies to everyone working at Pihlajalinna, regardless of their position or duties. Each Pihlajalinna professional is responsible for knowing the Code of Conduct and complying with the Code in their work. We also expect our cooperation partners to comply with these principles.

Pihlajalinna organises training on the application of the Code of Conduct for its personnel. The training is mandatory for all employees. In addition to the Code of Conduct, our daily work is guided by the more detailed instructions and policies available in the intranet and on our website.

On 16 January 2024, the Board of Directors of Pihlajalinna Plc has approved the Code of Conduct and it is valid until further notice.

Pihlajalinna's values:

Ethics

Energy

Open-mindedness



WE DO WHAT IS RIGHT

LEGISLATION AND HUMAN RIGHTS

We respect human rights and comply with the rules

We always comply with the valid legislation and other policies and authoritative guidelines directing our activities. We respect internationally recognised human rights and labour rights. We do not tolerate any violations of human rights, such as the use of child labour or forced labour.

ENVIRONMENTAL IMPACT

Minimising our environmental impact

We identify and aim to reduce the negative impact caused by our activities on the environment and the climate. We use resources sustainably in our daily work. We minimise loss, reduce the amount of waste and ensure appropriate sorting and disposal of waste materials.

WE PROTECT WHAT MATTERS THE MOST

PATIENT SAFETY

Ensuring patient safety

We produce services where ensuring patient safety is of utmost importance. Each Pihlajalinna professional working with patients must ensure the safety and quality of care in any situation. We aim to proactively reduce any risks related to treatment. We verify the professional qualifications of employees during recruitment and train new employees for their duties in accordance with an induction training programme. In our work, we comply with patient safety guidelines that are part of Pihlajalinna's ISO 9001-certified quality management system. We constantly measure and evaluate the quality of our services and our patient safety and systematically develop our activities. We report any detected anomalies without delay. We investigate any anomalies and customer feedback appropriately and carry out corrective measures.



DATA PROTECTION AND INFORMATION SECURITY

We respect privacy

We collect, process and store any personal and patient data with special diligence. In the processing of personal and patient data, we comply with legislation, official orders and Pihlajalinna's guidelines.

WE ENSURE THE WELLBEING OF OUR WORK COMMUNITY

LABOUR RIGHTS

We respect the freedom of association

We comply with Finnish labour legislation and collective agreements. Pihlajalinna respects its employees' freedom of association, such as the right to join a trade organisation or other lobbying organisation.

INAPPROPRIATE BEHAVIOUR

We treat others with respect

We treat other people, such as the members of our work community, our customers and our cooperation partners, appropriately and with respect. We do not tolerate inappropriate behaviour, sexual harassment or any other types of harassment, such as bullying, intimidation or threatening behaviour. Moreover, we do not tolerate any forms of violence.

EQUAL OPPORTUNITY

We do not tolerate discrimination

Pihlajalinna is an equal place of work. We want all the employees to have an equal opportunity of working and succeeding in their work. We do not tolerate any types of discrimination based on ethnic background, age, gender, sexual orientation,



religion, disability or other factors. We ensure that all decisions related to recruitment, remuneration and promotion are based on the competence and performance of each employee. We also treat all of our customers and cooperation partners equally and without discrimination.

OCCUPATIONAL HEALTHCARE AND OCCUPATIONAL SAFETY

We ensure health and safety

We actively tend to our health and wellbeing as well as those of the members of our work communities. We comply with safety instructions and report any accidents, close calls and safety observations without delay.

COMPETENCE DEVELOPMENT

We develop our skills as expert and as an organisation

We tend to the maintenance and development of the competence required in our work. We know the goals of our work and work community and promote them through our action.

WE ACT HONESTLY

ANTI-CORRUPTION

We do not tolerate corruption

We do not tolerate any type of corruption. The success of Pihlajalinna as a company is based on legal, fair activities, and we never try to promote or influence decisions concerning our business through criminal or otherwise inappropriate means, such as giving, offering, promising or accepting bribes or other unlawful benefits. Furthermore, we never abuse our position for our personal interests.

GIFTS AND HOSPITALITY

We comply with Pihlajalinna's guidelines concerning business gifts and hospitality

When interacting with stakeholders, we ensure that the gifts, hospitality and cost compensation we offer and accept are reasonable in terms of value and do not give the impression of inappropriate influence. We comply with Pihlajalinna's rules and guidelines concerning gifts, hospitality and cost compensation and respect our cooperation partners' policies concerning gifts.

CONFLICTS OF INTEREST

We avoid conflicts of interest

We avoid situations where our personal interests conflict with the interests of Pihlajalinna. We do not participate in decision-making in situations involving our personal interests or those of someone close to us, and we always inform the employer of any conflict of interest or a situation appearing to involve a conflict of interest. We do not let any personal relationships impact our decision-making when it comes to Pihlajalinna's business operations.

FAIR COMPETITION

We comply with the principles of fair competition

The activities of Pihlajalinna are based on open and fair competition, and we comply with competition legislation throughout our activities. We do not participate in any illegal activities restricting competition.

WE ENSURE RESPONSIBLE AND SUSTAINABLE INFLUENCE

CONFIDENTIAL INFORMATION

We maintain the secrecy of any confidential information

We maintain the secrecy of any confidential information provided to us. Confidential information includes any information related to the business activities or financial status of Pihlajalinna and our cooperation partners. We process and store confidential information securely and do not disclose confidential information to outsiders without legal grounds.

INSIDER INFORMATION

We comply with insider regulations and guidelines

We comply with valid insider regulations and Pihlajalinna's Insider Guidelines. We do not use insider information when trading with Pihlajalinna's stocks or other financial instruments. Furthermore, we do not disclose insider information to third parties.

COMMUNICATIONS AND MARKETING

We communicate responsibly

Pihlajalinna's communications and marketing are based on professionalism, reliability, truthfulness and up-to-date medical knowledge. We ensure that our communications and marketing are in line with these principles. We do not communicate in the media or on social media in a way that could damage the business image or reputation of Pihlajalinna. We comply with public companies' duty to disclose.

SPONSORSHIP AND DONATIONS

We comply with guidelines concerning sponsorship and donations

At Pihlajalinna, sponsorship and any related commercial agreements with sports teams or athletes, for example, are part of the marketing activities, and we make the related decisions in line with Pihlajalinna's marketing guidelines. We ensure that any donations or sponsorship offered by us do not involve hidden bribery or other inappropriate benefits.

POLITICAL ACTIVITIES

We do not support political activities

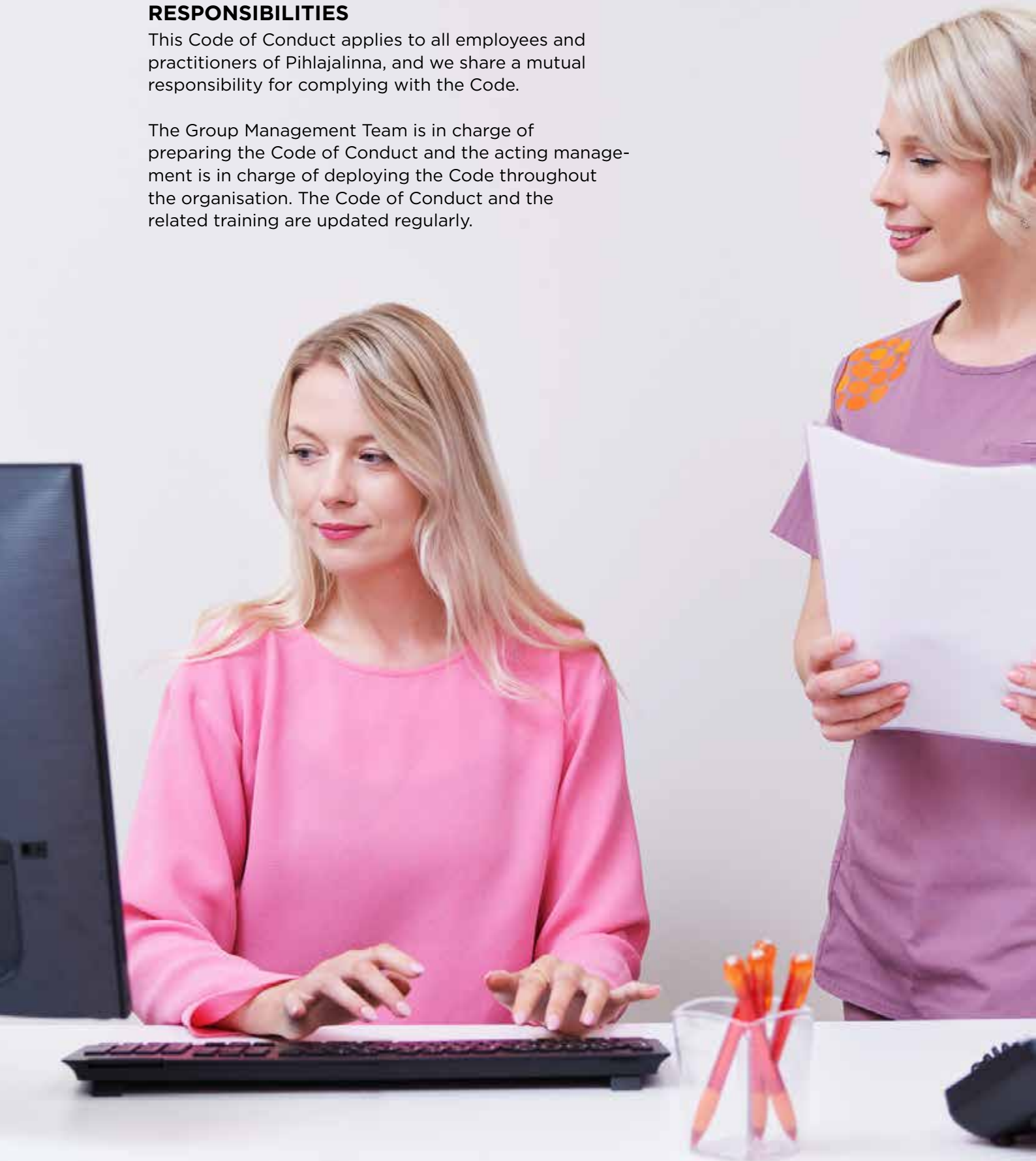
Pihlajalinna is politically independent. We do not provide financial support to political parties or election campaigns of individual candidates.

SUSPECTED INFRINGEMENT OF PRINCIPLES

RESPONSIBILITIES

This Code of Conduct applies to all employees and practitioners of Pihlajalinna, and we share a mutual responsibility for complying with the Code.

The Group Management Team is in charge of preparing the Code of Conduct and the acting management is in charge of deploying the Code throughout the organisation. The Code of Conduct and the related training are updated regularly.



REPORTING SUSPECTED MISCONDUCT

Each Pihlajalinna professional is responsible for reporting any suspected breaches of legislation or infringement of Pihlajalinna's Code of Conduct without delay. Report any observed or suspected misconduct to your supervisor or your supervisor's supervisor.

- Remember to also comply with the appropriate guidelines. Use the relevant guidelines to report matters such as quality anomalies, data protection anomalies or safety observations.
- If you have any suspicions, questions or observations about these guidelines, please contact the Group's legal department.
- You can also report your findings anonymously through the Pihlajalinna Whistleblowing channel. Each appropriate suspicion reported through the Whistleblowing channel will be investigated confidentially.

INVESTIGATING SUSPICION

The supervisors must process any suspicions of misconduct violating the rules or the Code of Conduct in an appropriate manner and take appropriate corrective action. The supervisors must treat all parties involved in a respectful manner and ensure that the employee does not suffer any negative consequences as a result of reporting their suspicion. The supervisors must report any cases or suspicions to the Group's legal department.

CONSEQUENCES

Infringing on the Code of Conduct may have various consequences, depending on the situation. In severe cases, acting in breach of this Code of Conduct may result in a warning or the termination of employment. Liability for damages or other legal consequences are also possible.

