



Code of Conduct

AINS Group



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A message from the CEO

Dear colleagues,

Responsibility and fair business practices have been the foundation of our company's success for nearly 70 years – and they must remain so in the future. In our everyday work, complying with laws and regulations is not enough; our actions must also be ethically sound. We must be able to stand behind our words and deeds, even if they were to be examined under major media headlines. Our reputation in the industry, and the trust we enjoy from our clients and partners, is built on this foundation.

In our Code of Conduct, we define the responsible and ethical behaviour that our clients, partners, our people, authorities, and the public expect from our employees and our company. Our values and ethical principles form the basis of our culture – one that we want our clients and stakeholders to be able to rely on.

The Code of Conduct provides us with a hand-book and a simple set of guidelines that help us make the right choices, especially in situations involving conflicts of interest. They serve as a backbone that helps prevent mistakes and avoid

difficulties. By following our own guidelines, we generally also meet the corresponding expectations of our stakeholders.

I expect every one of our employees to be familiar with, internalise, and follow these principles. A simple rule of thumb is this: if you are unsure about doing something, it is better not to do it or to ask for advice.

If you observe something that does not align with our principles, I encourage you to speak up. Doing the right thing is good business. By consistently choosing the right course of action, we collectively maintain a healthy corporate culture and safeguard the continuity of our company.

Together and better
Kari Kauniskangas
CEO,
AINS Group



Our values:
Together and better

OUR ETHICAL ALIGNMENT

We are committed to follow the following ethical conventions and initiatives:

- United Nations' Universal Declaration of Human Rights, UDHR, (1948)
- United Nations' Sustainable Development Goals (2030 Agenda for Sustainable Development, 2015)
- ILO fundamental conventions
- United Nations' ten principles of corporate responsibility (Ten Principles of the UN Global Compact)
- Science Based Targets initiative, SBTi
- Finland's national Circular Economy Green Deal

Purpose

Our Code of Conduct helps us make the right decisions in our daily work and identify the expectations towards our people and our company regarding sustainable and ethical conduct.

Fair, equal, honest and integrity driven business practices create a healthy working environment and strengthen trust among our customers and business partners.

We are committed to complying with the laws and regulations concerning our operations. This Code of Conduct complement them.

Scope

Our Code of Conduct and practices apply to all managers, supervisors and employees at the AINS Group. Each of us must read and internalise our ethical standards and comply with them. Violations of the Code of Conduct may lead to disciplinary measures.

ETHICS MEAN THE FOLLOWING FOR ALL OF US

- ✓ Act with honesty.
- ✓ Read and familiarize yourself with our Code of Conduct.
- ✓ Avoid conduct that could lead to breach of law or cause harm to the reputation of our company.
- ✓ Speak up and ask questions if something seems wrong.



2. Ethical conduct and speaking up

Ethical decision-making

If you are unsure whether your decision or actions are ethical or what their impact might be, you can evaluate them using the following questions.

CONSIDER

1. Is the decision/action against laws or regulations?
2. Does it endanger someone's health?
3. Is the decision/action against our internal guidelines?
4. Would you feel uncomfortable presenting the decision/action to a colleague, supervisor or the media?
5. Is it against the ethical guidelines set by our client for the project?

If you answered Yes to any of these questions, do not proceed with the decision/action and ask your supervisor for guidance.

Culture of speaking up

A culture of speaking up means that we can discuss all matters openly, at the right time, and with a solution-oriented approach. It is built on trust, respect, and the shared goal of working better.

SPEAK UP!

- Concerns, unclarities and risks are brought up early, before they grow into problems.
- Discussions are solution-oriented, not fault finding. Leadership style is open and attentive.
- Everyone has both the right and the responsibility to address concerns, regardless of their role or position.

If you need assistance with any concerns, please contact your supervisor or a representative from Legal or Human Resources.

Reporting channels and handling of misconduct suspicions

Report any suspicion or concern related to misconduct directly to your supervisor, or if needed, to HR or the legal department. If necessary, you may use the protected and anonymous whistleblowing channel available to our personnel as well as to other stakeholders on our website at ains.fi/en/company/sustainability.

The processing of reports is based on trust. Once a report is submitted, it is investigated and processed confidentially and without delay. Whistleblowing reports are jointly reviewed by the General Counsel and the Director of Human Resources.

Reporting misconduct or related concerns may sometimes feel difficult, but it is important. You can report using your name or anonymously. In all cases, we protect the identity of the reporting person and protect them from any retaliation.

OUR WHISTLEBLOWING CHANNEL 

3. People

Human rights

We are committed to respecting human rights in accordance with the United Nations' Guiding Principles on Human Rights, Sustainable Development Goals and the ILO fundamental conventions.

Human rights belong to everyone, and we do not tolerate any form of human rights violations. Through our own actions, we can promote the realization of human rights and fair working conditions. It is our duty to address any human rights violations we witness. We do not accept human rights violations in our value chain.

Everyone has the right to join a trade union and to engage in trade union activities without the fear of discrimination or retaliation.

WE NEVER ALLOW:

- ✗ forced labour, human trafficking, child labour or modern slavery in our business operations or value chain.
- ✗ restrictions on the right to unionise or engage in trade union activities against the local legislation.

Equality, diversity, and inclusion

We are committed to promoting equality, diversity, and inclusion in all our operations.

Every individual has the right to be treated with respect and in an equal and safe manner, regardless of their background, characteristics or position. We believe that diversity enriches our work community and leads to better solutions for our clients.

Everyone must be able to be themselves at work and participate fully without fear of unequal treatment.

HOW WE ACT:

- ✓ We treat everyone with respect, regardless of background, identity, or personal characteristics.
- ✓ We work together as one team despite our differences.
- ✓ We provide equal opportunities.
- ✓ We offer a psychologically safe working environment.
- ✓ We encourage others to express their opinions, even if they differ from ours.



Harassment, discrimination, and inappropriate conduct

We do not discriminate against anyone or treat anyone unequally on the basis of age, origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation, gender, gender identity, gender expression, or any other personal characteristic or other characteristic protected by the local law.

We do not tolerate any form of harassment, discrimination, bullying, or other inappropriate behavior.

Inappropriate conduct may appear in many forms, such as words, expressions, gestures, written communication, or physical actions.

HOW WE ACT:

- ✓ We treat each other with respect. We acknowledge people's different cultures, religions, and backgrounds.
- ✓ If your conduct could appear inappropriate or offensive, or if you are unsure whether it is appropriate, do not proceed with it and act in a different way.

WE NEVER ALLOW:

- ✗ harassment, discrimination, bullying, or any other form of inappropriate conduct.

EXAMPLES OF DISRESPECTFUL BEHAVIOR

- repeated social exclusion
- threatening, pressuring, humiliating, and undermining behaviour
- treating a person based on stereotypes, such as “we need a man for this project” or “older employees cannot keep up with change”
- repeated name-calling or use of a nickname the person does not approve
- demeaning someone's work or competence
- displays of offensive material
- offensive jokes
- sexual harassment, i.e. unwanted sexual behaviour
 - inappropriate comments or displaying inappropriate material
 - sexually suggestive gestures of affection or any other unwanted touch
 - abuse of power or position
- physical threats or violations of physical integrity

Occupational health and safety

We want every one of our experts and subcontractors to be able to work safely every day, without endangering their health or wellbeing. We never compromise safety to achieve any objectives. We are committed to zero workplace accidents.

Every member of our personnel has the right to refuse work or a task that is dangerous or whose safety they are uncertain about. Our personnel also have the right and the obligation to participate in occupational safety-related orientations and training.

Everyone is obligated to report accidents and near misses in compliance with construction site rules and our internal guidelines. We protect those who report incidents or who refuse dangerous work from any form of retaliation.

Working under the influence of alcohol, drugs, or any other intoxicating substances is prohibited. A substance-free workplace ensures the safety of people, the quality of work, and the company's reputation. Moderate alcohol consumption may be limitedly permitted by management's decision at separate events organized by the company. More information on our internal early support model can be found on the intranet.

We encourage maintaining a healthy balance between work and free time. Everyone can promote this through their own example and by planning work in a way that enables such balance.

Business travel must follow our travel guidelines. When travelling, we take into account local legislation, culture, and safety.

If you need assistance with any concerns, please contact your supervisor or a representative from Legal or Human Resources.

HOW WE ACT:

- ✓ We stop work if safety is at risk and report any dangers we notice.
- ✓ We participate in occupational safety training and orientations.
- ✓ We plan our work in a way that supports our own wellbeing and that of others.
- ✓ We travel safely and take into account local circumstances as well as the travel guidelines of the company.

WE NEVER ALLOW:

- ✗ endangering the safety or wellbeing of our personnel or subcontractors.

4. Environment and quality

Our responsibility for quality and the environment

Through high-quality engineering and expert work, we create healthy, safe, sustainable and pleasant environments and conditions, within the limits of the natural environment's carrying capacity. The solutions we provide for our customers are safe for their users.

We comply with environmental laws and regulations. We identify the environmental risks and opportunities of our operations and utilise our expertise to reduce harm and increase environmentally positive impacts.

We develop our experts' circular economy competences as well as actively offer solutions that promote and implement circular economy in our client projects. We are committed to this through the Finland's national Circular Economy Green Deal.

We systematically reduce the climate impact of our own operations and our value chain. Each of our experts can do their part through climate-friendly business travel or recycling waste in the workplace. Our company is committed to science-based emission reduction targets.

We always strive for truthful and neutral communication regarding environmental impacts.

HOW WE ACT:

- ✓ We report any observations and risks related to quality, the environment and user safety in line with our internal guidelines.
- ✓ We identify and consider the environmental impacts of our work as well as the opportunities of circular economy. We actively strive to reduce environmental harm.
- ✓ We actively share our environmental expertise with colleagues and clients.
- ✓ We take the science based climate targets into account in our operations.

WE NEVER ALLOW:

- ✗ violations of environmental laws or regulations or indifference towards the natural environment.
- ✗ solutions that endanger users or neglect user safety.

If you need assistance with any concerns, please contact your supervisor or a representative from Legal or Human Resources.



5. Fair business practices

Anti-corruption

We do not accept the misuse of influence for personal gain or the benefit of others in any form. Corruption may take many forms and typically involves situations in which authority is misused to obtain an advantage.

Corruption includes bribes, grease payments, kickbacks, and unfair favouring of relatives or acquaintances.

Kickbacks refer to payments made to a client's representative in return for favouring a company in procurement decisions.

STAY ALERT IN THE FOLLOWING SITUATIONS:

- Unusual payments, gifts, or benefits, such as large Hospitality and entertaining expenses, and unusual requests related to them.
- Attempts to bypass processes or pressuring to select a particular supplier without justification.

In addition to money, bribes may also be gifts, trips or favours. Sponsorships or gifts directed at a person's friends and family can also be considered bribery.

We do not act in ways that could be considered or interpreted as corruption, even if it is not directly against the law or regulations.

HOW WE ACT:

- ✓ We stay particularly alert in situations where the risk of corruption is unusually high.
- ✓ We report any suspicions of corruption to the Legal Department.

WE NEVER ALLOW:

- ✗ offering or accepting any advantages that could be considered corruption.

Conflicts of interest

All our employees are bound by the duty of loyalty. We always act in the best interests of the company and avoid conflicts of interest. A conflict of interest arises when personal interests or the interests of your close circle conflict with those of the company.

Identifying conflicts of interest is important, as even the impression of a conflict of interest may damage the business operations and reputation of the company. An impression of a conflict of interest may arise even when there is nothing improper about the situation.

We pay attention to situations in which a family member or other close person is involved in some way. A conflict of interest may arise, for example, in the recruitment process where the job applicant is a family member, or in procurement decisions where the purchase is made from a company owned by a family member.

Some of our client projects may involve companies that are publicly traded. In such cases, we may become aware of insider information. In these situations, we must follow our insider trading guidelines.

HOW WE ACT:

- ✓ It is our duty to report any conflicts of interest that involve us, or we are aware of, to a supervisor without delay.
- ✓ We always make decisions in the best interests of the AINS Group.

WE NEVER ALLOW:

- ✗ misuse of insider information.
- ✗ intentional concealment of conflicts of interest.

Gifts and hospitality

Hospitality refers to any advantage or gift that has value, for example, goods, favours, money, loan, entertainment, ticket, trip or hospitality.

Any hospitality or gift we give or receive must be customary and moderate. When we assess the moderateness of a gift, we take into account all gifts given to or received by the same party during the entire year. The value of an individual gift or hospitality must be under 200 euros per person. We do not accept or gift money or similar benefits, such as gift cards.

We avoid offering gifts or hospitality to public officials with the exception of providing a customary lunch, moderate stakeholder events and occasions, and moderate gifts related to anniversaries or retirement in accordance with the policies of local public administration.

We do not give or accept gifts or hospitality intended to influence decision-making in an ongoing matter or obtain an undue advantage or that could appear as bribery. Even moderate gifts or hospitality must not be offered to public officials if they could influence or be considered as influencing, for instance, procurement decisions.

When giving gifts, we consider any known guidelines of the recipient.

Sponsorship

Donations and sponsorship and other forms of financial support, for example, an individual, team, organization or event require approval from the Management Group. The recipient of the sponsorship must not conflict with our values or our Code of Conduct, and it should have a connection to our company's objectives.

Inquiries and proposals related to donations and sponsorships are directed to Corporate Communications. Student collaboration is coordinated by Human Resources.

HOW WE ACT:

- ✓ When offering or receiving hospitality or gifts, we check our own guidelines as well as the recipient's guidelines.
- ✓ We avoid offering even moderate gifts or hospitality when they may influence, or be considered as influencing, active decision-making, such as bidding processes.
- ✓ We refuse to receive gifts and hospitality that exceed our own guidelines.

WE NEVER ALLOW:

- ✗ giving or receiving gifts that are intended to influence decision-making.
- ✗ giving gifts or hospitality to public officials in situations where they may influence, or be considered as influencing, procurement decisions.
- ✗ seeking improper advantages by giving or receiving gifts.

Fair competition and relationships with competitors

Our business operations are based on fair competition, which promotes efficiency and innovation, and in that way also a well functioning market economy. We do not make arrangements to restrict competition, engage in bid-rigging, or participate in price fixing, market agreements, or the manipulation and allocation of markets. We acknowledge our market position as designing, engineering and construction management consultants, and do not accept its misuse.

We do not discuss pricing, commercial terms, or other confidential market information with our competitors. When we participate in joint bidding with our competitors, we are especially careful not to share information that could distort competition or impede fair competition in other ways.

We do not receive market information that restricts competition, even if the source is a member of our family or an employee who has joined our company from a competitor.

HOW WE ACT:

- ✓ If we suspect that fair competition may be at risk, we seek advice from our Legal Department.
- ✓ When we meet competitors at industry events, we keep discussions on a general level.
- ✓ We remain also alert when speaking with former employees or members of our family and friends.

WE NEVER ALLOW:

- ✗ restricting fair competition.
- ✗ sharing of pricing, commercial terms, corporate acquisitions, or other confidential market information.

Political activities and lobbying

We only participate in political activities in our free time, and we keep them separate from our work and role in the company. Our company does not make donations or otherwise support political movements, election campaigns, candidates, or religious organisations.

We actively participate in the development of our operating environment and industry through our trade associations and at the public officials' level, but lobbying directed at political decision-makers requires the approval of the company's Board of Directors.

If you need assistance with any concerns, please contact your supervisor or a representative from Legal or Human Resources.

Sanctions and anti-money laundering

We do not participate in money laundering or the financing of terrorism, nor do we conduct business in countries, or with companies and individuals that are subject to Western sanctions.

We do not accept cash as a method of payment under any circumstances. We recognise that unusual transactions may be criminal or damaging to our reputation.

6. Information security, asset protection and communication

Information security and data protection

Protecting our own and our clients' data is highly important. We are committed to maintaining and improving high quality information security.

We use company workstations, email addresses and software only for tasks related to the operations of the company, never for other activities. We only download software to our workstations if the company has approved of it.

We store company devices carefully to prevent theft or loss. In case a device is lost or damaged, we report it to IT Department without delay.

We take good care of our keys, we use our company ID card at the office, as well as ensure that there are no outsiders without an accompanying person on the company premises. We follow the clean desk policy: we do not leave documents visible or leave our workstation unlocked.

When using artificial intelligence, humans always make the final decisions. We do not enter our own or our clients' data into software or services that the company has not approved. We follow our internal AI guidelines when using artificial intelligence.

We do not collect or store personal data without a valid reason. We protect personal data and destroy any personal data if there are no reasons to store it. We only share information according to our information classification and manage access to information on a need-to-know basis.

HOW WE ACT

- ✓ Everyone is responsible for our information security culture. We use strong passwords, keep them to ourselves, do not use the same password for multiple services, or connect personal devices, such as USB sticks, to workstations or the company network.
- ✓ We do not install potentially harmful software or software that poses an information security risk.
- ✓ We report all our observations related to information security to IT Department, including phishing messages, data falling into the wrong hands, or abnormal activity.

WE NEVER ALLOW:

- ✗ attempts to avoid or breach information security guidelines.

Company and stakeholder assets and business-related documents

We respect the company and its clients' assets, including business-related information and documents. We take care of these assets and only use them for the agreed company purposes. Documentation must be sufficiently accurate, up-to-date and truthful. We only make purchases, bids or contracts in accordance with formal authorisations. We do not tolerate the falsification or manipulation of information.

HOW WE ACT:

- ✓ We use the company and its clients' assets, such as workstations, vehicles, cameras and measuring equipment, only for work purposes.
- ✓ We record our working hours and expenses truthfully. We separate personal and leisure expenses from the company expenses clearly.
- ✓ We handle work related files, plans, templates and other documents carefully and appropriately.

WE NEVER ALLOW:

- ✗ misuse of the assets or documents of the company or clients or directing them for private use, i.e. stealing.
- ✗ saving documents to the personal devices, personal cloud services or for personal use.
- ✗ exceeding procurement or contract authorisations.
- ✗ manipulating time sheets, expenses, accounting records, documents or key figures, or misleading the investigation of authorities or other parties.

External communication

Well-planned and well-executed external communication supports our business objectives, enhances the client experience, and helps maintain trust in our operations.

We are committed to responsible and open communications and to providing information that is truthful, impartial, and timely.

We speak publicly or issue statements on behalf of AINS Group only when authorised to do so.

HOW WE ACT:

- ✓ We are truthful in all our external communication, including our marketing messages.
- ✓ Before giving public statements as representatives of the AINS Group or a client project, we confirm with the client or our supervisor that we have permission to do so.

WE NEVER ALLOW:

- ✗ attempts to mislead or present false claims about our services, products or future outlook of the business.
- ✗ publishing confidential, personal or commercially sensitive information online or on other public channels.

Social media guidelines

We follow these guidelines especially when we present ourselves as employees of the AINS Group on social media.

HOW TO ACT ON SOCIAL MEDIA

- We treat others with respect and in a fair and equal way. We do so both on social media and in real-life encounters.
- We do not write offensive content. We show respect for those who read our posts.
- We do not share personal data or inappropriate posts or images.
- We do not publish confidential information or trade secrets. If unsure, we seek advice.
- We encourage well-reasoned discussion and interaction – from expert to expert.

If you need assistance with any concerns, please contact your supervisor or a representative from Legal or Human Resources.

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