



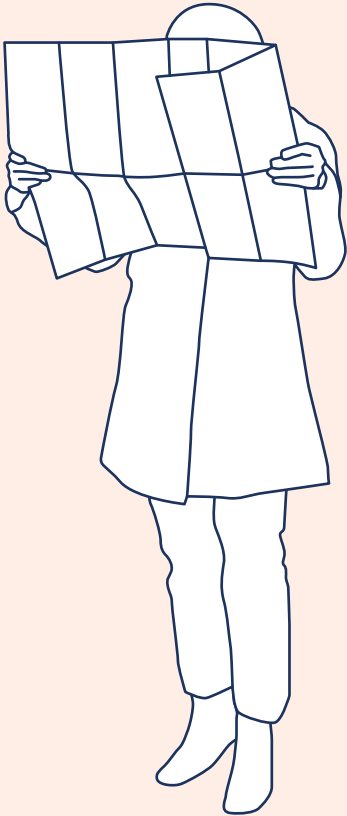
Code of Ethics

CSC – IT Center for Science



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Message from our CEO

The purpose of CSC's activities is to promote the operating conditions of Finnish research, education, public administration and companies. As a non-profit company owned by the state and universities, it is our duty to uphold exemplary transparency, integrity and accountability. We will not merely refrain from doing the wrong thing; we are determined to promote high-quality service activities produced at the highest ethical standard.

Our values – Community, Expertise, Assurance, Integrity – are the foundation of all our work. With this Code of Ethics, we can transform our values into actions. The Code of Ethics explains why our values are important and presents the norms, practices, and guidelines based on these values. It concretizes what we mean by good business practices and healthy interaction with stakeholders, society, and the environment.

The purpose of the Code of Ethics is to help us all make good choices, especially when we find ourselves at crossroads. By adhering to the Code of Ethics, we succeed together and build trust.

Trust is the foundation of CSC's success. Customers, suppliers, owners and personnel must be able to fully rely on us to fulfil our commitments and promises in an ethically sustainable manner.

Each of us plays an important role in maintaining our values, developing a positive corporate culture, and caring for CSC's reputation. We expect everyone at CSC, including management and the board, to adhere to this Code of Ethics without exception. We also encourage all our suppliers and partners to adopt the values outlined in our Code of Ethics.

Kimmo Koski
CEO



General

Purpose and Scope

Purpose

The purpose of the Code of Ethics is to guide our choices and ensure that we all have a unified understanding of the rules, guidelines, and principles that direct our actions.

CSC's values are CSC's conscience. Our values guide all our decisions. We will always and in all situations act according to our shared values: Community, Assurance, Expertise, Integrity. The Code of Ethics presents practical principles and guidelines that ensure we all act ethically and comply with laws and regulations. The purpose of the Code of Ethics is also to build a positive corporate culture. Each of us can positively influence our corporate culture through our actions and decisions.

We uphold internationally recognized human rights and national fundamental rights. We are committed to the ten principles of the UN Global Compact.

Scope

Without exception, our Code of Ethics defines the actions of everyone at CSC: our personnel, management, the Board of Directors and the partners who operate as part of our teams. The Code of Ethics is supplemented by more detailed internal instructions.

It is up to each of us to read, understand and comply with the Code of Ethics and related internal instructions and policies. Compliance with the Code of Ethics is of utmost importance to us, and its violation may lead to legal actions. We encourage all our suppliers, subcontractors and other partners to commit to values and principles that align with CSC's Code of Ethics.

Our values

- **As a community:** We work together with our customers to achieve the best results, advance national collaboration and inspire one another.
- **Expertise:** We put effort into developing our competence and skills and challenge ourselves to being one step ahead.
- **With assurance:** We listen to our customers and provide them with our expertise. We respect each other.
- **And integrity:** We embrace responsibility by working in an open and ethical manner, committing to mutual objectives and producing high-quality with sustainability.

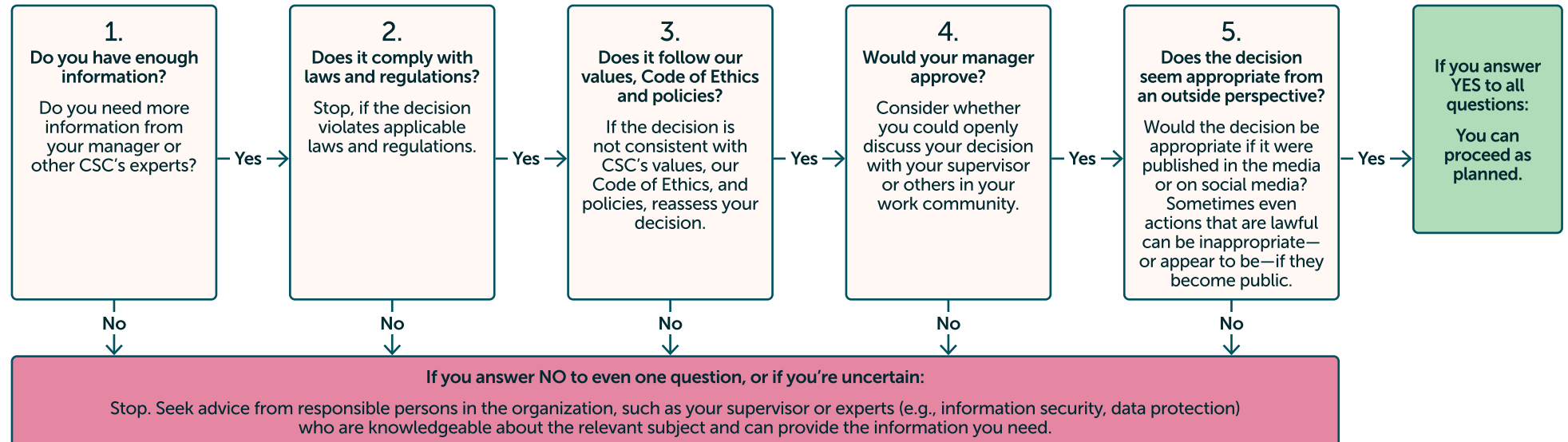
Ethical Decision-making at CSC

The Code of Ethics does not cover every situation or answer all possible questions. In today's complex and fast-paced working life, each of us makes decisions every day. The purpose of the Code Ethics

is to help us make those decisions as responsibly as possible. You don't have to—and shouldn't—face difficult decisions alone. There are various channels available where you can seek help. These channels

are listed in the "Resources" section of each part of this Code of Ethics.

When you're unsure about the ethics or compliance of a decision, you can evaluate it using the following questions.

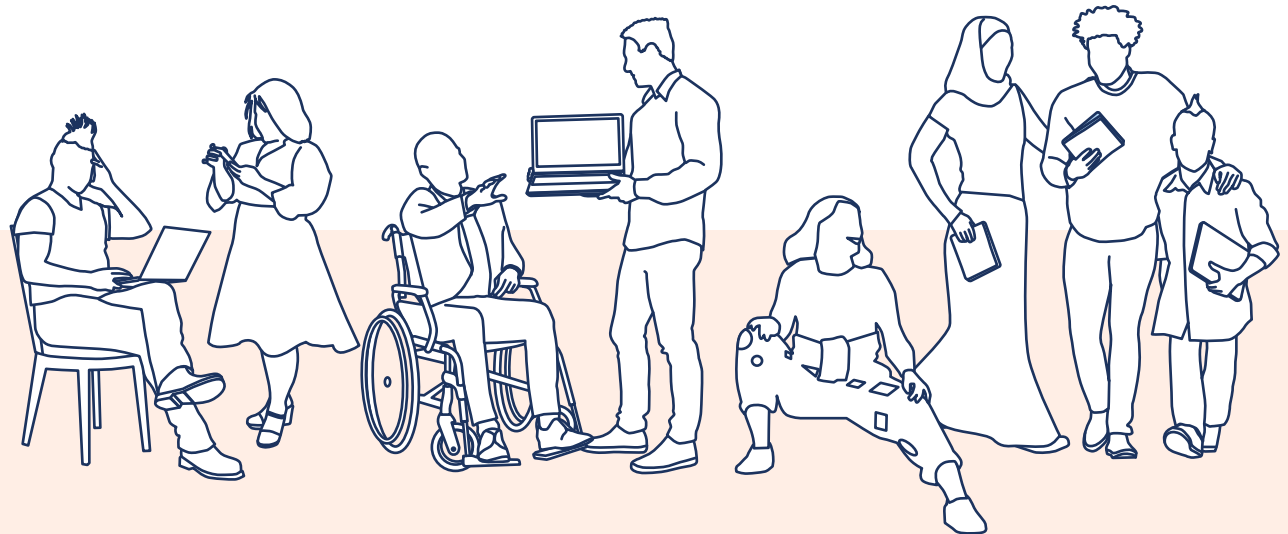


Responsibility starts with each of us

Following our Code of Ethics is the responsibility of each one of us. The Code of Ethics sets high ethical standards for employees, management, and the Board of Directors. By acting in accordance with our values, we maintain trust, foster a positive company culture, and create the conditions for sustainable success together with our customers.

Management and supervisors have additional responsibilities related to the Code of Ethics due to their roles. They are responsible for introducing employees to the Code of Ethics and related guidelines, ensuring compliance, setting and achieving goals, and serving as role models in promoting a positive company culture.

They are also accountable for addressing and responding to any behavior that goes against the Code Ethics or other internal policies.



Responsibility of all CSC's employees

- Familiarize** yourself with the Code of Ethics and its supporting documents, and follow the practices outlined in them.
- Participate** in training related to the Code of Ethics.
- Ask** for help if you're unsure how to apply the Code of Ethics in practice.
- Report** any suspected violations of the Code of Ethics without delay. Detailed instructions can be found in the chapter *Speaking up*.
- Do not** engage in illegal activities and avoid any behavior that may appear inappropriate or could damage CSC's reputation.
- Review** the Code of Ethics and its supporting documents annually as part of your CSC discussion.
- Promote** a positive company culture through your own actions.

Responsibility of Management and Supervisors

- Take responsibility** for exemplary adherence to the Code of Ethics and require those working within your area of responsibility to do the same.
- Identify** risk factors related to your area's operations and proactively work to minimize them.
- Ensure** that every new employee in your area participates in training on the Code of Ethics.
- Review** the Code of Ethics annually with each employee in your area as part of the CSC discussion.
- Respond** to employees' questions regarding the Code of Ethics and help resolve any issues—or escalate them to the appropriate party when necessary.
- Address** any concerns or misconduct promptly and fairly.
- Promote** a positive company culture through your own example one that builds trust and encourages openness and the reporting of concerns.

Our Responsibility for Sustainable Business

Impactful Business

We produce services directly to our owners, as there are many questions to which open market cannot offer ready solutions. We identify the customer's need and provide the most suitable solution, implemented using either CSC's own offerings or ready-made solutions available on the market. When ready-made solutions are not available, we build the service based on the customer's specific needs. Our role is to ensure that our customers do not run out of means. We do not compete with commercial operators.

We produce customer-oriented and high-quality services and we enhance our service development processes in such a way that their cost-effect impacts are beneficial to the customer, society and us. We listen to our customers and service users and are committed to developing our services to achieve a better user and customer experience.

We provide accurate and truthful information on the content, use and safety of our services so that our customers can make informed decisions. We face our risks and mistakes head-on, and we do not hide them. We strive for transparency and open dialogue with our customers. For our part, we strive to resolve any conflicts without delay and through joint negotiation, without causing undue burden on our customers.

Resources

- [CSC's strategy and ownership strategy](#)

What does "a company entrusted with special state assignment" mean?

- CSC is a company entrusted with special state assignment and owned by the state of Finland (70% of the shares) and Finnish higher education institutions (30% of the shares).
- Companies entrusted with special state assignments are companies owned either partly or completely by the state. The company has an assignment defined, regulated and overseen by the state.
- The ownership strategy outlines the owners' intent regarding CSC. In addition, CSC's special state assignment is defined in the shareholders' agreement.

Gifts and hospitality

CSC's business conduct must be based on objective criteria, and we do not accept any means of influencing our judgement or that of our stakeholder representatives.

We comply with the UN Convention against Corruption (UNCAC) and the OECD Anti-Bribery Convention. We adhere to moderation and transparency when receiving and offering gifts and hospitality. We never accept monetary gifts or gift cards. An acceptable gift does not place a debt of gratitude on the recipient of the gift, create expectations for any favor in return or cause the giver to favor anyone. We always consider what the situation looks like to an outsider.

We do not accept, request, receive, give, or promise any gift or other benefit that:

- is against Finnish law;
- exceeds what is considered a reasonable gift or hospitality;
- could damage our reputation or undermine public trust in CSC's independent operations;
- is unusually frequent or comes from the same individuals or organizations repeatedly.

Resources

If you encounter an attempt at bribery, or if you are unsure about the appropriateness and/or transparency of a gift or hospitality, report it immediately to your supervisor and to your supervisor's manager.

What is a bribe?

A bribe is a payment, gift, favor or anything else of value that is offered, accepted or requested with the intent to influence another person's actions or decision-making.



Conflicts of interest

We always act in the best interest of CSC and our customers. We avoid situations where CSC's interests may conflict with direct or indirect personal interests. We withdraw from actual or potential decision-making situations where the benefit is directed personally to ourselves, our family, our friends or the community or organization we represent. We handle and resolve conflicts of interest with supervisors in a confidential and constructive spirit.

CSC does not directly or indirectly support political party candidates, parties or political groups. This means that we do not make CSC's

resources available for promoting political campaigns or ideas. CSC reports all lobbying efforts to the Finnish Transparency Register in accordance with the law.

Resources

- Discuss any potential conflicts of interest with your supervisor
- [The Finnish Transparency Register](#)



Procurement and supplier relationships

CSC is a contracting authority under the Public Procurement Act and complies with procurement legislation as well as our internal procurement guidelines when making purchases.

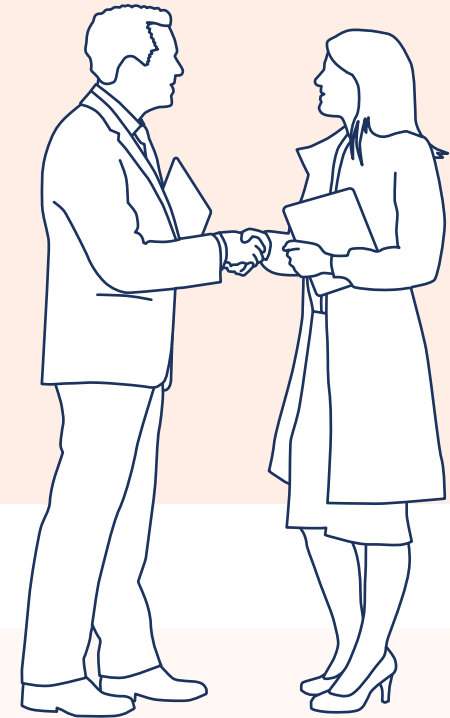
We include social, environmental and safety requirements in our procurement agreements. We commit to taking immediate corrective action if the ethics of our supply chain is called into question. We actively assess risks in our supply chains and have tools and practices in place to mitigate those risks.

Suppliers are an integral part of CSC's service production. We require our service providers and suppliers to comply with agreements and guidelines governing good business practice and the laws and regulations applicable at any

given time. We do not accept the use of illegal labor in our assignments or the assignments of our suppliers or any of our partners. We are committed to taking action if we become aware of any violations of contracts, laws, or regulations, or the use of illegal labor. We inform our suppliers about CSC's safety guidelines and require them to comply with and commit to these guidelines. We act as a reference for our suppliers when separately agreed.

Resources

- [Procurement policies and guidelines](#)



Our responsibility for the community and the environment

Work community

Our diversity is our strength, and mutual trust and respect are essential for our success. We uphold the principles of diversity, equity and inclusion.

All decisions regarding an individual employee, including recruitment, career development and compensation are based on merit, i.e. abilities, competence, skills and accomplishments.

Diverse teams perform better and bring a wide range of expertise and more innovative solutions to CSC. The benefits of diversity can only be realized by ensuring an inclusive culture and ways of working. We do not accept discrimination, harassment, inappropriate conduct or bullying for any reason. This kind of behavior undermines our diversity, equity and inclusion principles, values, and often violates the law.

We expect every CSC employee to contribute to creating a psychologically safe work environment. Everyone is responsible for reporting any inappropriate behavior or harassment they experience or witness. As a company, we address

inappropriate and disruptive behavior without delay and strive to foster an atmosphere where everyone feels safe to raise concerns without fear.

Trust is built in everyday life through actions and words. We each do our part to promote a positive working environment through friendly, considerate and polite conduct. When we talk to each other, face to face or in digital channels, we keep the content appropriate and friendly. We value one another and respect each other's professional expertise. We work together smoothly, actively share information with one another, and make decisions transparently. Our personnel are our greatest strength. We ensure the professional development of our personnel and encourage everyone to participate in lifelong learning.

CSC respects employees' freedom of association and their right to be represented through trade unions and other parties representing employees (personnel representative, shop steward, occupational safety representative). We comply with the generally

applicable collective agreement of our sector. We provide personnel representatives with access to all the information they need to perform their duties, and we make sure to maintain communications with them.

Resources

- [Guidelines on dealing with unfair treatment and harassment](#)
- [Non-discrimination and Equality Plan](#)
- [Work Ability Management](#)
- [Language Policy](#)
- [Playbook for Workplace Communication](#)

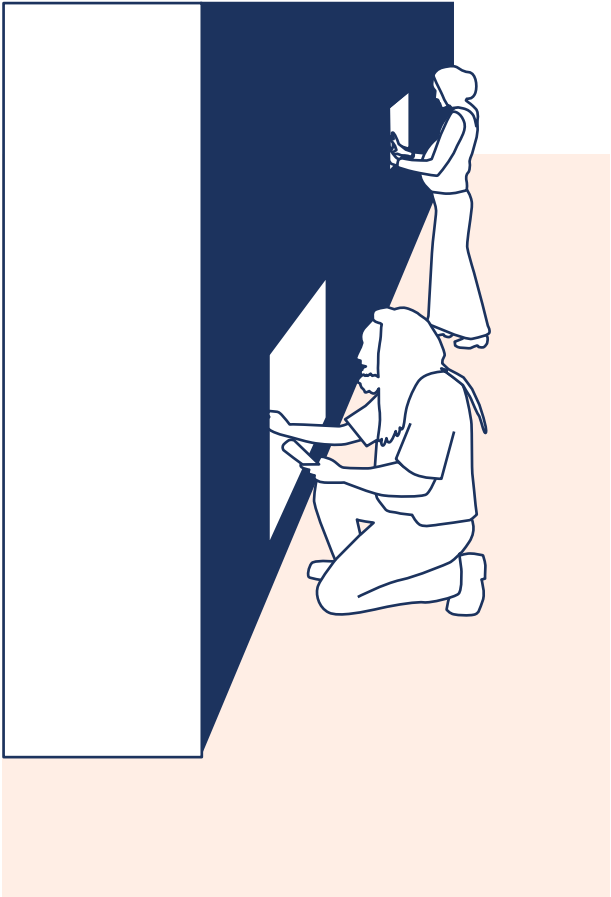
Occupational health and safety

CSC is committed to maintaining and continuously improving the health and safety of our working environment. As an employer, we are responsible for risk assessments, guidance, induction, and monitoring compliance related to occupational health and safety. We encourage and support everyone to maintain a good work-life balance. We do not compromise on health or safety for business or any other reasons.

Each of our employees is responsible for following the guidelines and reporting hazards and near-miss situations.

Resources

- [Occupational Healthcare](#)
- [Occupational Safety](#)
- [Occupational safety guidelines for data centers](#)
- [Work Ability Management](#)



Environment

We are committed to environmental efforts and their continuous improvement. Environmental impacts are taken into account in all of CSC's operations. We are dedicated to minimizing negative environmental effects, such as climate impacts caused by energy use, while maximizing the positive impacts enabled by our work, such as the research we support. We also consider environmental impacts throughout our value chain.

We monitor the emissions generated by our operations and report on them annually.

We take environmental impacts into consideration in our decision-making. We encourage CSC's employees to adopt practices that reduce environmental strain and to develop environmentally sustainable services.

Resources

- [Sustainability at CSC](#)

Our responsibility for information, assets, and reputation

Data protection and privacy

We ensure that all our operations comply with current data protection regulations. In all processing of personal data, we adhere to data protection principles, meaning we process personal data:

- lawfully, fairly, and transparently from the perspective of the individuals concerned
- only for specific, explicit, and legitimate purposes
- only to the extent necessary for the purpose
- ensuring the data is accurate and up to date
- only for as long as necessary
- confidentially and securely.

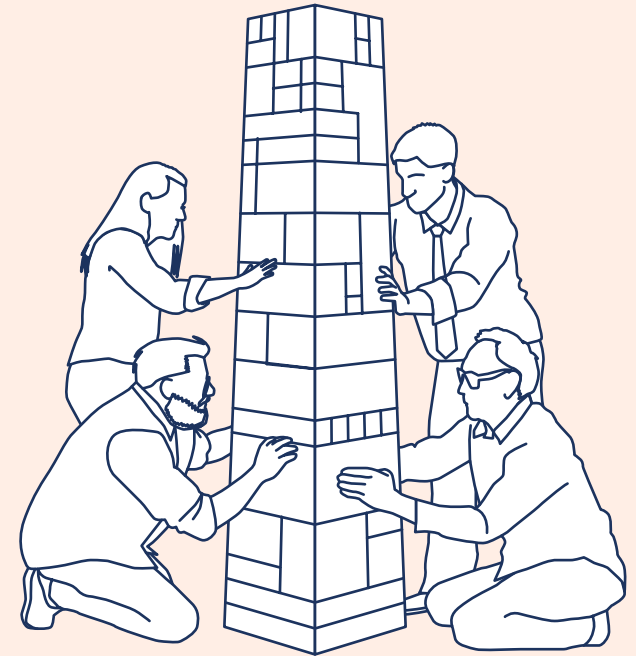
We understand our role in personal data processing — whether we act as the data controller or as the data processor on behalf of our customers — and the responsibilities that come with each role. We take various measures to ensure data protection,

based on the level of risk involved in the processing and in accordance with customer instructions. These measures include, for example, completing mandatory and supplementary data protection trainings, emphasizing privacy by design in technical planning, contractual controls, and various technical and organizational safeguards depending on the service.

As employees, we also respect each other's right to privacy and handle all personal data confidentially and with great care.

Resources

- [Data protection and privacy policies and guidelines](#)
- privacy@csc.fi



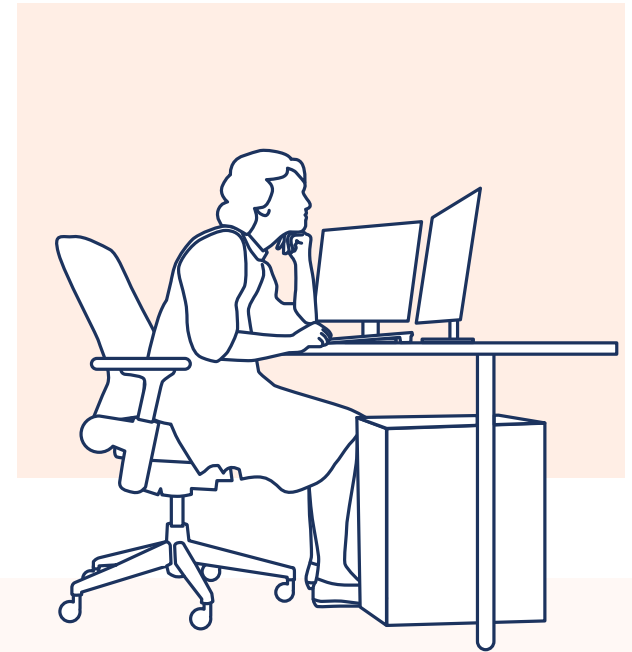
Information security

Realistic risk management and proactive security measures based on its results form the foundation of our information security. Everyone at CSC has a role to play in ensuring information security. CSC's information security policy defines information security responsibilities for different roles. CSC's services are based on verified and validated information security. It is important that all CSC staff adhere to the CSC information security guidelines and participate in information security trainings. Already in CSC's contract of employment, the staff commits to adhere to CSC information security guidelines and policies.

Legislation, agreements, and CSC risk management requires us to protect the security of CSC's services. A secure service should be accessible to its users, and the data in it should be secured in accordance with information security guidelines and best practices.

Resources

- [Information security policies and guidelines](#)
- security@csc.fi



Finance and company assets

We use funds responsibly and effectively. We strive to use the resources invested in us wisely, aiming to generate the greatest possible societal benefit and impactful results for our customers.

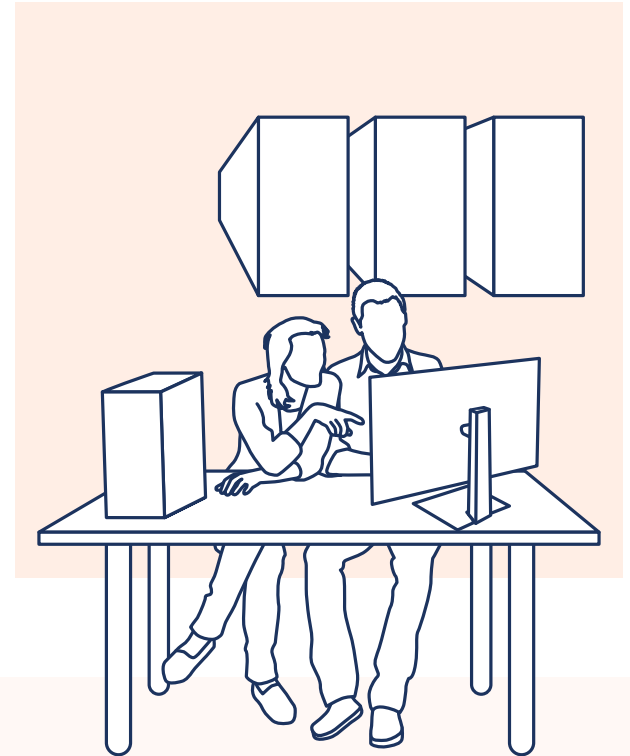
We comply with the applicable Finnish laws governing the company's accounting and reporting.

We carefully handle CSC's tangible and intangible assets. Such assets include facilities, instruments, office equipment and supplies, communications equipment, information systems, software, financial assets, copyrights, and other proprietary information and know-how. We only use CSC's assets for legitimate business and purposes, and we protect them appropriately from physical and digital damage, unauthorized use, loss, and other similar risks.

We do not take personal advantage of CSC's internal information or the opportunities revealed through it. We handle the property of a supplier, customer or other third party and the trade secrets and intellectual property rights handed over to us in ways required by the obligations imposed on us.

Resources

- [Financial policies and guidelines](#)



How we communicate about our activities

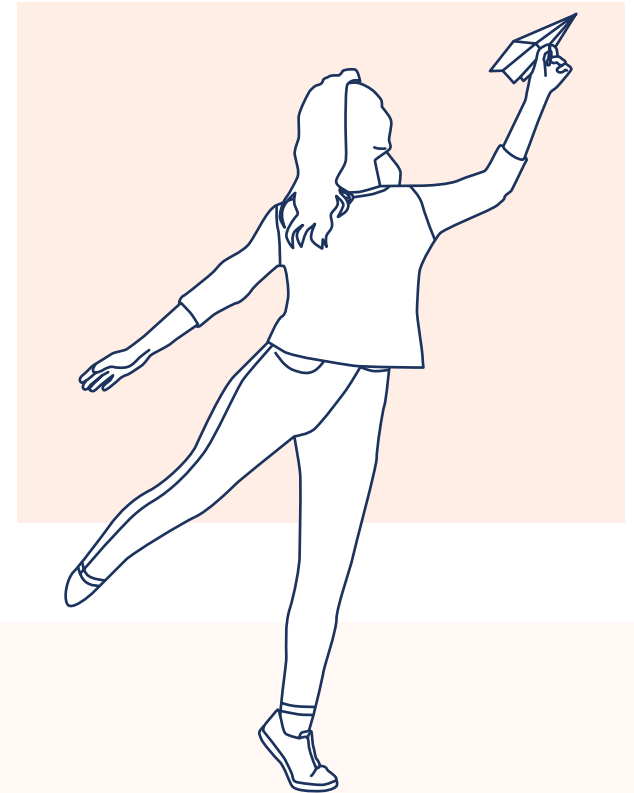
CSC's communication and information flow must be open, timely, and factual. We encourage our entire personnel to engage in genuine dialogue throughout the organization. We will inform our personnel honestly and without delay about matters concerning them, including difficult decisions.

Our communications to the public are truthful and timely. We have processes and responsibilities for communication, and it is of utmost importance that they are followed. We welcome media contacts and are prepared to discuss in public everything concerning CSC while taking account of the specified responsibilities related to communications. We never make statements on behalf of CSC or give

the impression that we represent the official position of CSC unless we have been authorized to do so. We take due consideration when talking about matters concerning CSC outside the company, on public forums, in blogs and in social media.

Resources

- [Communications policies, guidelines and materials](#)
- viestinta@csc.fi



Speaking up

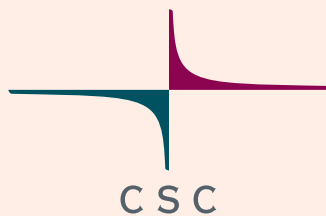
A violation of the Code of Ethics undermines the trust of owners, customers, and other stakeholders, and exposes CSC's work community and business operations to risks. Therefore, any potential violations or suspicions of such must be reported without delay.

By reporting in time, you help address issues before they lead to harmful consequences. We understand that speaking up takes courage, but it is in our shared interest to raise concerns. All reports are handled impartially and confidentially, and those who report are supported and listened to—even if they are not entirely certain about the misconduct. We do not tolerate any negative consequences against individuals who, in good faith, report a violation of the Code of Ethics. Verified violations will result in appropriate actions being taken. A breach of the Code of Ethics may lead to legal proceedings.

How can I speak up

- There are various channels available to report a violation of the Code of Ethics. These channels are listed in more detail under the "Resources" section of each part of this Code of Ethics. In addition to the listed channels, a report can always be made to your immediate supervisor or their supervisor. Reports concerning discrimination, inappropriate behavior, harassment, or abuse of managerial authority can also be made to a shop steward, occupational safety representative, employee representative on the board, or the Employment Relations Manager (HR).
- Reports of Code of Ethics violations can be submitted anonymously via the [Whistleblower](#) reporting channel, if desired. The channel is operated by EQS, an independent service provider that ensures the confidential handling of reports. Neither EQS nor CSC can identify the reporter unless you voluntarily provide your contact information. For anonymous reports, all communication related to the case takes place within the system, so it is important to follow up in the system after submitting your report. It is always recommended to include enough information in the report to enable further investigation (e.g., what happened, when, and who was involved).

**Let's work together to ensure
that we all follow the Code of Ethics!**



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