

Epassi Business Partner Code of Conduct

INTRODUCTION

At Epassi Group, we are committed to conducting our business in accordance with applicable laws and regulations, our internal policies and our values and ethical principles. We expect all our business partners to act with the same integrity and fairness. This Business Partner Code of Conduct (the “BPCoC” or the “Code”) sets out the minimum standards required of our business partners and constitutes an essential element of every contract between the business partner and Epassi Group. Where there are discrepancies between legal and regulatory requirements and this BPCoC, or between the business partner’s own code of conduct and this BPCoC, the stricter standard must always be followed by the business partner.

“Business partners” refers to all suppliers, vendors, consultants, advisors, distributors, resellers, agents, and any other parties with whom Epassi Group does business.

Epassi Group expects that all business partners respect the basic requirements for the environment, human rights, and ethical trade and align with the values and best practices outlined in this BPCoC, fostering a shared commitment to trust, sustainability, and ethical business practices. Epassi Group will emphasize commitment to the ideals of the Code when choosing business partners, and the expectation of the fulfilment of these requirements takes place in close cooperation and dialogue with our business partners. All our business partners must stay updated on and comply with current sustainability, human rights, and ethical trade standards.

COMPLIANCE WITH LAWS AND REGULATIONS

Business partners must comply with all applicable laws, regulations, and international standards in the countries where they operate, including but not limited to anti-corruption and anti-bribery laws, competition and antitrust laws, environmental laws and regulations, labor laws and data protection and privacy laws.

ETHICAL BUSINESS PRACTICES

Epassi Group is committed to maintaining the highest standards of ethical business practices and expects the same from its business partners. This ensures trust and integrity in all our operations. We require that all our business partners maintain the highest standards of integrity, honesty, and transparency.

Anti-corruption

Corruption is the abuse of entrusted power for private gain. All business partners must actively oppose both facilitation and financing of corruption and have zero tolerance for any form of corruption. Our business partners must ensure that their books, records, and transactions are managed completely, accurately, honestly, and on time. They must never accept or offer personal gain – whether money, services, or other benefits – in exchange for a business transaction.

Bribery, gifts and hospitality

Bribery means offering, giving or receiving a financial or other advantage, typically with the aim of getting a favorable decision. Any offer, promise, grant or gift to third parties must not be in contradiction with the applicable national and international legislation. Where gifts or hospitality are offered, these should not be intended or interpreted as an attempt to improperly influence business decisions. No business partner or its employee shall directly or indirectly offer or receive any illegal or inappropriate gifts, money, or other remuneration, to achieve commercial or personal advantages.

Conflicts of interest

A conflict of interest arises when personal interests, or those of close associates, could interfere with impartial decision-making. All business partners must be committed to identifying and addressing conflicts of interest to ensure decisions are made with integrity and fairness.

Prevention of money laundering and financing of terrorist activities

Our business partners have a duty and legal obligation to prevent funds of illegal origin from entering and abusing financial systems. To fulfil this obligation, Epassi Group expects all its business partners to implement a risk-based approach for the prevention of money laundering and the financing of terrorist activities, in accordance with applicable legislation and internationally recognized best practices.

Additionally, all business partners must comply with all applicable trade and import regulations, including sanctions, freezing orders and embargoes that apply to our business. In case of an unordinary activity or concerns about potential connections to sanctioned individuals or entities, business partners must take immediate steps to ensure compliance with all legal requirements.

Fair trade and competition

All business partners must conduct business in an open, fair, and transparent manner, adhering to competition laws and avoiding market manipulation. Business partners must respect free market regulations and not engage in practices such as price-fixing, collusive bidding, or other anti-competitive behavior.

SOCIAL RESPONSIBILITY

Human rights

All business partners are expected to respect, safeguard, and actively advance internationally recognized human rights.

Labor rights

Epassi Group's business partners must uphold internationally recognized labor standards and ensure fair and respectful treatment of all workers.

All business partners must provide safe and healthy working conditions, fair wages, and reasonable working hours in accordance with applicable laws and industry norms. Discrimination based on race, gender, age, religion, disability, sexual orientation, or any other protected characteristic is strictly prohibited. Workers must be free to associate, organize, and bargain

collectively without fear of retaliation. We expect our business partners to promote diversity, equity, and inclusion throughout their operations and supply chains.

Ban on forced labor, modern slavery and child labor

Our business partners must not use or benefit from any form of forced, slave, bonded, or compulsory labor. Workers must not be required to lodge deposits or identity documents with the employer, and they are free to leave with reasonable notice.

Our business partners must not use or benefit from any form of child labor. The minimum age for workers must not be under 15 years or under the local legal minimum age for employment or compulsory schooling, whichever is higher. A minimum age of 14 may be accepted if the local minimum age is set to 14 years in accordance with the exception in the ILO Convention 138. Children under 18 years must not perform work which endangers their health, safety, or morale, including night work.

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment. Any form of psychological, physical or verbal abuse, intimidation, threat, or harassment must not be tolerated.

Non-discrimination

There shall be no discrimination regarding employment, remuneration, training, promotion, dismissal, or retirement based on ethnicity, caste, religion, age, disability, gender, marital status, sexual orientation, trade union work, or political affiliation.

Privacy

The purpose of data protection is to safeguard all individuals – employees, merchants, and customers using the services of Epassi Group – against any violation of their privacy when processing personal data.

Personal data is any information relating to an identified or identifiable natural person. This covers any information that could lead to direct or indirect identification of a living individual.

To maintain compliance with all applicable rules and regulations – and to preserve the trust of employees, customers, and partners – all personal data processed by our business partners must be processed fairly, lawfully, and transparently.

Personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up to date
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- processed in a manner that ensures appropriate security of the personal data.

All our business partners must commit to handling personal data responsibly and ensuring it is processed with the highest standards of security and integrity.

Information security

It is crucial to secure the confidentiality, integrity, and availability of information processed by the business partner.

Information shall only be processed when it is necessary for legitimate business purposes. It shall not be disclosed to third parties unless there are legal grounds for doing so. All our business partners must be committed to ensuring that all information is handled responsibly and in compliance with applicable rules and regulations.

ENVIRONMENT

Our business partners must respect the environment. Wherever possible, all business partners must aim to prevent or minimize and mitigate the harmful effects of our operations on the environment. Business partners must comply with all environmental laws and regulations.

REPORTING MISCONDUCT

This BPCoC defines the minimum standards that Epassi Group requires its business partners to respect when conducting business with Epassi Group and reserves the right to revise the Code in a timely manner and in accordance with the existing agreements between the parties. If you become aware of or suspect any breach of applicable laws, this BPCoC, or Epassi Group approved policies or guidelines, report your suspicions without any delay.

The business partner must immediately report any non-compliance with this Code to the contact person identified in their agreement (suppliers) or to the local merchant channel (merchants) and provide relevant information at the request of Epassi Group. The business partner shall allow Epassi Group, either alone or together with Epassi Group's client, or a third-party authorized by Epassi Group, to verify compliance with an audit of the business partner's premises and operations. The business partner shall also, upon request, provide Epassi Group with relevant information, for example by answering questionnaires, providing documentation, or sharing other material.

If Epassi Group determines, or has a verified suspicion, that the business partner has not complied with this Code, the business partner must then promptly implement corrective measures and provide satisfactory evidence of compliance. Notwithstanding the foregoing, Epassi Group reserves the right to terminate the main contract if its business partner commits a material breach of this Business Partner Code or refuses to address the non-compliance. Both parties further acknowledge that a material breach of this Code may be treated as a material breach of the main contract.

Persons who are not Epassi Group personnel may report breaches to the centralized reporting channel of the Ministry of Justice, which may be accessed through the following link:

[Centralised external reporting channel – the Office of the Chancellor of Justice | Chancellor of Justice \(oikeuskansleri.fi\)](#).