Fondia Group

Code of Conduct

Our Commitment to Law, Integrity and Ethics

FONDIA

Fondia Group CEO's statement

Fondia Code: Doing the Right Thing

At Fondia, everything starts with our values.

They are not words on a wall or slides in a presentation. They guide how we work together, how we serve our clients, and how we make decisions every day. They are a big part of what makes Fondia, Fondia.

The Fondia Code is our way of turning those values into practice. It describes the standards we expect from ourselves and from each other. It helps us understand what acting with integrity looks like in our daily work, how we treat people with respect, and what it means to take responsibility for our actions.

Of course, no code can cover every situation we may face. The world is simply too complex for that. What the Fondia Code can do is give us a common direction and a shared understanding of how we want to behave when things are straightforward and when they are not.

The Fondia Code applies to all of us: employees, Managing Directors and members of the Board of Directors alike. Regardless of role or title, the expectation is the same. We all need to know the Code, understand what it means in our own work, and follow it consistently.

An important part of living our values is speaking up. When something doesn't feel right, we should not look the other way. If we witness or become aware of behaviour that goes against the Fondia Code, we should raise the concern. Creating a culture where people can speak up safely is a responsibility we all share, and anyone who raises concerns in good faith deserves our support.

When you face a difficult decision, I encourage you to stop for a moment and ask yourself a simple question: Is this the right thing to do? If the answer is unclear, seek advice, discuss it with colleagues, and let our values guide you.

I encourage every one of you to take the time to read the Fondia Code carefully. Think about what it means in your role and how it can help you in your everyday work. By living our values and the principles in this Code, we continue to build a company that colleagues are proud to be part of and clients are proud to work with.

Let's continue doing the right thing, together.

With Law,

Timo Lappi
CEO



Our Values

It all starts with Fondia values. Our values not only guide how we treat each other and other people, but they also lead us in our work and solving our customers' needs. We Fondians are proud of and passionate about our professionalism and being different.

In all our actions and leadership, we strive to uphold our values. Based on our values:

- *Dare to Create*
- *Law Made Smart*
- *Pride & Passion*
- *Give and Receive*
- *My Place to Work*

Please, be inspired by Fondia Values.



Our Clients

Our clients are at the centre of everything we do. We are committed to providing high-quality legal advice that is clear, practical, and tailored to each client's needs. We want to guide our clients in a proactive manner to do the right thing in a complex world.

We act ethically and with integrity, honesty and independence in all client matters, and we always act in the best interests of our clients. Everyone in the company — regardless of role — is expected to uphold these standards in every client interaction, large or small.

Client Engagement

We confirm the scope of our assignment (e.g. LDaaS service, legal advisory or other service) to ensure that the client and Fondia have aligned expectations.

We actively seek regular client feedback to further develop our services.

Insider Trading

We are committed to complying with legislation on insider trading. As a publicly listed company, we must maintain an Insider Policy that supplements applicable insider regulations. In addition, as a legal services provider, we also follow the Fondia Insider Trading Policy, which governs insider matters arising from client work and trading in publicly listed shares and securities. As the Fondia Code or Fondia's Insider Policy or Insider Trading Policy cannot give you specific advice for every situation, please ask further guidance from insider@fondia.com, when needed.

Competition

Fondia supports free competition. We are committed to competing fairly and with integrity. We comply with competition laws.

Conflict of Interest

We avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions. We comply with Fondia Conflicts of Interest Policy.

Fondia's Law and Order Policy

Fondia and our lawyers are committed to complying with Fondia's own Law and Order policy which is aligned with the local Bar Association ethical principles. Fondia complies with all local legislation and regulations and commits to doing business in an ethical and professional way.

Data Protection and Privacy

Fondia is committed to safeguarding the personal data we process to a high standard. We take a comprehensive approach built on clear guidelines, robust technology, trained people, and ongoing awareness, so that data protection is embedded in the way we work.

Confidentiality, Information Management and Security

We commit to protect and keep confidential all client data received in connection with client assignments. We depend on the use and exchange of information for our business. We commit to protect all client data, especially personal details, commercially sensitive information, and intellectual property. We also have a duty to ensure we retain proper records of our business activities and client information to preserve corporate memory and to meet legal and regulatory requirements. To keep pace with evolving risks, we regularly review and update our information security practices, and every employee applies Fondia's Information Security Guidelines in their daily work.

Whistleblowing / Reporting Suspected Misconduct

Our clients, counterparties and third parties can report their possible concerns via Fondia Whistleblowing Channel as instructed on Fondia's website.

Our People

People and culture are at the heart of Fondia's strategy. We aim to be one of the best places to work in the legal industry by fostering a culture built on trust, psychological safety, responsibility, continuous development and high performance. We are committed to providing an inclusive, respectful, and supportive working environment in which everyone can grow and perform at their best. In return, every Fondian is expected to take an active role in building and protecting this environment through their everyday actions, choices, and interactions.

This Fondia Code sets out the principles and expectations that help us build an inclusive, respectful and high-performing workplace together. Following these principles is a personal responsibility.

Respectful Conduct

We expect everyone working at or representing Fondia to treat others with respect, consideration and professionalism. Harassment, bullying and other inappropriate conduct have no place at Fondia, regardless of a person's role, seniority or performance.

Anyone who experiences or witnesses inappropriate conduct is encouraged to speak up. All concerns will be taken seriously and addressed appropriately.

Alignment with our values and expected behaviours is an important part of working at Fondia, from recruitment through everyday collaboration and leadership.

Equality, Diversity and Inclusion

Fondia is committed to building a diverse, equitable, and inclusive workplace in which everyone is treated fairly, equally, and with respect. We value different backgrounds, experiences, perspectives and ways of thinking. Fondia does not tolerate discrimination on any basis, including but not limited to gender, race, sexual orientation, ethnic and national origin, social background, religion, age, disability, health, political opinions, family responsibilities, marital status, or any other condition that could give rise to discrimination.

Employment-related decisions are based on legitimate and objective criteria. Every Fondian is expected to contribute to an inclusive working environment by treating people fairly, challenging their own assumptions, avoiding discriminatory behaviour and enabling others to participate and contribute. If we notice behaviour or practices that may conflict with these principles, we are expected to raise the matter through an appropriate channel rather than ignore it.

Well-being and Psychological Safety

Fondia is committed to providing a physically and psychologically safe workplace that supports sustainable well-being and work-life balance. We value well-being in its own right and recognise it as essential to sustained performance and excellent client service.

Also, every Fondian is expected to contribute to a safe and sustainable working environment where colleagues can ask questions, acknowledge mistakes, request help and express concerns without fear of retaliation or humiliation.

Personal Development

Continuous learning is essential to our professional excellence and future success. Fondia supports employees in developing their legal expertise and broader professional, business, interpersonal, and technological capabilities. Every Fondian is responsible for maintaining and developing the knowledge and skills required in their role, to seek and respond constructively to feedback, and to share knowledge with others.

Leadership Responsibility

Everyone in a leadership role has a responsibility to lead by example, communicate expectations clearly, treat people fairly, and address inappropriate behaviour. Leaders are expected to create an environment where people feel safe to speak up, take responsibility, develop, and perform at their best. They must address concerns and performance issues fairly, consistently, and without unnecessary delay, while respecting individual dignity.

Leadership responsibility does not replace individual responsibility. Every Fondian remains accountable for their own conduct and choices as well as work and contribution to the workplace according to their role.

Speaking Up

At Fondia, everyone has the right and responsibility to speak up when they have concerns. Employees are expected to report suspected violations of this Fondia Code, Fondia policies or applicable law, honestly and in good faith.

We strive to create an open and supportive environment where concerns can be raised through appropriate channels, including people leaders, People & Culture and Fondia's Whistleblowing Channel.

Fondia takes all concerns seriously, investigates them appropriately and does not tolerate retaliation against anyone who reports a concern or participates in an investigation in good faith.



Our Communities

As a provider of legal services, Fondia promotes the rule of law in the wider society and acts as an active member in the legal community.

We expect all Fondians to meet all applicable laws and regulations, this Fondia Code as well as high ethical standards. We require our suppliers and business partners to comply with relevant laws and the requirements set out in Fondia's Supplier Code of Conduct.

Fondia conducts its own operations in a responsible manner, that promotes our business as well as contributes to the surrounding society. We have a Corporate Responsibility Programme to forward our ambitious sustainability targets, and we publish our sustainability report annually.

Good Governance

Fondia Plc is a listed company on Nasdaq First North Growth Market Finland. As issuer, Fondia's status requires its governance to be of high quality, and to comply with the applicable regulatory framework governing listed companies. To ensure good governance as well as transparent administration, reporting and investor communication, Fondia also voluntarily complies with all applicable recommendations of the corporate governance code for the Finnish listed companies (Corporate Governance Code 2026). The Finnish Financial Supervisory Authority and Nasdaq Helsinki Oy supervise Fondia's activities, and Fondia's certified adviser ensures that Fondia complies with the requirements and obligations of the Nasdaq's First North Growth Market Finland marketplace. Fondia has several policies and guidelines in place that comply with the requirements for listed companies. Fondia's investor websites contain extensive information on Fondia's corporate governance, and Fondia publishes annually an Annual Report, a Corporate Governance Statement and a Remuneration Report for Governing Bodies.

In addition, Fondia has recorded the decision-making responsibilities in the Delegation of Authority guideline. The aim is to share responsibility, ownership, and decision-making in an effective manner.

Responsible Use of AI

We are committed to the responsible use of Artificial Intelligence (AI), in line with Fondia's AI Policy and our professional conduct rules. We protect client data, confidentiality and privilege at every stage of AI use, and remain mindful of its social and environmental impacts. We maintain human oversight of AI-supported work, invest in ongoing training, and take care to identify and address bias in the tools and outputs we rely on. We are open about how we use AI, and we continue to explore its capabilities to strengthen the quality of the legal services we provide.

Anti-Corruption and Anti-Bribery

Fondia has zero-tolerance approach to bribery, corruption, and facilitation payments. Gifts and hospitality should never influence business decisions in Fondia. We follow local legislation as well as Fondia's Gifts and Hospitality Policy.

Suspicious Activities, Anti-Money Laundering and Anti-Terrorism Financing

We do not provide services to parties who are involved in illegal, suspicious, or corrupt activities or activities that would make us breach the Fondia Code. To comply with our anti-money laundering regulations obligations, Fondia applies the principles and processes defined in our Know Your Customer Policy. We must know our clients and carry out a due diligence check on all new clients. We also identify and report any suspicious transactions in the context of our client assignments.

International Sanctions

To comply with our sanctions regulations obligations, Fondia applies the principles and processes defined in our Know Your Customer Policy. Regular sanctions screening of clients is carried out and clients from countries under a sanctions regime are not accepted.

Human Rights

We commit to respecting internationally proclaimed human rights. We are committed to ensuring that our business does not cause or contribute to any adverse human rights impacts.

We are committed to supporting international efforts against slavery, child labour, and human trafficking in compliance with the applicable international laws. We expect our suppliers and partners to do the same and to comply with our Supplier Code of Conduct.

Environment

We set great importance to contributing to the battle against climate crisis. Fondia has committed to reduce its CO2 emissions by 42% by year 2030 compared to the base value of year 2022, and to become carbon neutral by year 2050. Our environmental targets have been validated by global Science Based Target initiative and we calculate our emissions annually to keep on track.

In practice this means preferring sustainable options, such as certified renewable energy, eco-certified supplies and food and encouraging sustainable commuting and business travel.

Fondia encourages our suppliers and business partners to join this mission by complying with our Supplier Code of Conduct and committing to climate actions.

Pro Bono Work

We also want to make a difference through our pro bono work and make a positive contribution to the creation of an inclusive, safe and environmentally friendly society. We provide legal advice without compensation to our pro bono partners, which are non-profit organisations selected annually. We strive for long-term cooperation in our pro bono work to support our partners in the best possible way. We carry out pro bono work in all Fondia countries.

Political Activities

Fondia does not take part in political activities nor make political payments.

