

# Code of Conduct

Terveystalo

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# Shared Code of Conduct supports doing the right thing

At Terveystalo, our mission is to fight for a healthier life. Through our Code of Conduct, our values are crystallised into practical principles upon which our daily operations and decision-making are based. These guidelines support our corporate culture and create a framework that helps us to act right in our everyday work.

## Terveystalo's values:



### Human being at the centre

We take responsibility for the health and well-being of our fellow human beings, for the opportunity to live a good life. We work together to help our customers, and our customer guides us in our renewal. We support each other and value all our experts.



### Steered by medical science

Everything we do is based on medical science and research. All our decisions are steered by the efficacy of our care and the well-being of our customers.



### Reforming healthcare

We foster continuous development. We challenge ourselves to build more functional healthcare for everyone and reform the industry with open-minded use of technology.

# We are motivated by the pursuit of improvement and the desire to do what is right

Terveystalo's mission is to fight for a healthier life. As Terveystalo employees, our task is to provide fluent, caring, and effective healthcare and to always think of the best for our customers and our company. The company's strategy and values guide our operations. The way we work is described in our Code of Conduct. The Code also reflects the commitments we have made to our key stakeholders.

I am proud of Terveystalo's healthy operating culture, which is based on openness, a low hierarchy, transparency, and a solution-oriented approach. We act with integrity and consistency – we are motivated by the pursuit of improvement and the desire to do what is right. We also take responsibility in challenging situations. Ethical behaviour is shown through daily actions and decisions. However, a healthy culture does not protect us from mistakes, and things are rarely completely black and white. Even with good intentions, one can end up in a grey area.

The Code of Conduct serves as our common compass, guiding our choices and providing direction in challenging situations. We strive to do the right thing regardless of the circumstances, and if a mistake occurs, we acknowledge and correct it. This integrity and humility create the foundation for our continuous renewal and long-term success.

Ville Iho,  
CEO

**Terveystalo**



# The Code of Conduct is our joint commitment

The Code of Conduct consists of 15 principles that guide the way we serve customers, interact with each other, and conduct business responsibly. The guidelines apply to all of us, whether we are Terveystalo employees, supervisors, or private practitioners. We carefully familiarise ourselves with these guidelines and Terveystalo values, ensuring we live up to them in our daily work. We all have a responsibility to act correctly and to support our colleagues in doing so.



## We expect the following from everyone working for Terveystalo:

- Familiarise yourself with the Code of Conduct and act by it daily.
- Act in accordance with Terveystalo's values. Familiarise yourself with the guidelines related to your work tasks. Update your knowledge regularly.
- When something is unclear, do not hesitate to ask for advice. Your supervisor or the Legal & Compliance team are there to help.
- If you notice any activity contrary to the Code of Conduct, other misconduct, or suspect such, report it. You can find instructions at the end of this document.
- If you are a Terveystalo employee, complete the Compliance e-learning course in Terveystalo Academy.



## As a supervisor, we expect the following from you in addition to the above:

- Lead by example: As part of your role, you are uniquely positioned and entrusted with the responsibility to uphold and demonstrate our core values and the Code of Conduct in daily operations.
- Support and encourage your team to act in accordance with our values and the Code of Conduct, ask for advice in unclear situations, and raise concerns and suspicions of misconduct. Ask for help from the Legal & Compliance team if necessary.
- Ensure that your team completes the Compliance e-learning course in Terveystalo Academy.
- Report any non-compliance with the Code of Conduct or suspicion of such to the Legal & Compliance team without delay.

# Human being at the centre

# Delivering safe, high-quality care is our foremost priority

Safety and quality are our highest priorities and fundamental responsibilities. We ensure patient and customer safety in every encounter and all situations. This involves providing safe care, medication, and equipment use, as well as understanding, adhering to, and jointly developing Terveystalo's established processes.

Our core value is being "steered by medical science": we operate with evidence-based knowledge, expertise, and transparent decisions. All decisions and actions are guided by the best interests of patients and customers, carried out in a transparent, equitable, and accountable way. Safe, high-quality care and service arise from expertise, mutual trust, and shared dedication to Terveystalo's values and professional standards.

## Remember:

- We act in accordance with Terveystalo's patient safety guidelines.
- We file an incident report if we detect a threat to patient or customer safety.
- We report both near misses and actual incidents.





## Principle 2

# We operate transparently and in mutual understanding with our customers

Trust is the foundation of all our work and is born from openness and respect. We always care for and serve our customers through mutual understanding, listening, and involving them. We ensure that the customer understands their treatment path, the content of the service and the next steps.

Our treatment recommendations are based on medical evidence, but we respect the customer's right to self-determination. We provide the necessary information to support treatment decisions and help the customer understand the content of their service package. We respect the content of the customer's agreements and invoices with clear and understandable grounds.

### Remember:

- We ensure that the customer knows the next steps of their care path and understands the content of their service.
- We clearly state what the service covers.
- We adhere strictly to each corporate customer's agreement and consistently comply with the invoicing requirements and instructions specified for each customer.

# We value privacy and data security

As a healthcare provider, we have a responsibility to protect sensitive information and critical systems that enable us to offer high-quality care to our customers. Ensuring data protection and security is everyone's responsibility at Terveystalo.

We respect privacy and the protection of personal data, whether it concerns patients, customers, staff, job applicants, partners, or other stakeholders. We collect, process, and store data carefully, securely, only for permitted purposes, and in accordance with applicable legislation.

Data protection of patient information is an integral part of patient safety. Personal and patient data are processed only by those employees who have the right to do so as part of their job duties.

## Remember:

- We are familiar with Terveystalo's policies and guidelines regarding data protection and security, and we complete the mandatory training related to them.
- We process patient data only as much as is necessary for the organisation, planning, implementation, monitoring, and supervision of care or service.
- We record only necessary and sufficient personal data. We avoid excessive or irrelevant information.
- We store and process data only in the systems intended for them and avoid unnecessary printing.
- We never discuss confidential or secret matters in public spaces or with individuals who do not have the right to process that information.
- We react to potential data security breaches and suspicions by reporting them immediately.





## Principle 4

# We deliver meaningful results

At Terveystalo, our task is to produce services and care that promote the long-term well-being, functional capacity, and health of our customers. In line with our values, we are committed to reforming healthcare, and we value continuous development. We aim to create accessible, effective healthcare for all and transform the industry through unbiased use of technology.

We are committed to the ongoing development of our expertise, operational processes, and working methods to ensure that our commitment to advancing healthcare is fulfilled for both our customers and society. We operate with clear objectives and a proactive approach.

We respect each other's time by working efficiently with defined roles and responsibilities. This is essential to ensuring patient safety and quality care.

### Remember:

- We continuously develop our professional skills and competencies.
- We share our expertise within our work community.
- We are familiar with the policies and guidelines applicable to our own role.
- We respect each other's time and work effectively and efficiently.

# We meet our customers on their terms

Delivering meaningful and customer-focused services to Terveystalo's diverse customer groups is fundamental to the effectiveness of our work.

We listen to our customers to understand their unique needs and the operating environments of our corporate customers. We seek solutions that create added value for the customer. Individual needs and situations are considered from the very beginning of service and customer journey development.

We acknowledge that fostering customer-oriented, attentive, and equitable interactions enhances both the effectiveness of our services and care and improves the overall customer experience.

## Remember:

- We ask to understand and do not make assumptions on behalf of the customer.
- We treat our customers with respect, considering their unique point of view.
- Our approach to customer-centricity focuses on identifying the optimal solution for each individual, rather than applying a standardised method to all.
- We listen to the customer's individual needs and take them into account when we develop our services and interactions, both digitally and face-to-face.





## Principle 6

# We respect each other

We respect everyone we meet in our daily work. We do not tolerate bullying, harassment, or inappropriate behaviour, and address these issues promptly and systematically. Creating a safe space is our joint effort.

We value each person's unique traits, such as personality, experience, age, gender, sexual orientation, ethnicity, and skills. We want to ensure an inclusive work environment where individual characteristics are seen as strengths, and everyone feels accepted as themselves.

We do not misuse our position or let unnecessary hierarchy get in the way of our interactions. We actively encourage everyone to bring up challenging topics, as we believe that open dialogue results in improved ways of working.

### Remember:

- We address all forms of inappropriate behaviour, harassment, discrimination, and hate speech, even when it is not directed at us.
- We report such misconduct primarily to our supervisor or their supervisor.
- We value diversity and treat everyone with kindness and without prejudice.
- We support each other and hear out everyone's views and perspectives, even if they differ from our own.
- We maintain an open discussion culture by showcasing mutual respect.
- We apologise if we offend anyone.

# Safety is our common cause

For us, a safe work environment is everyone's right and a result of joint effort. We ensure that the work environment supports both the physical and psychological safety and well-being of our professionals. At Terveystalo, everyone is empowered to work in the best possible way.

We familiarise ourselves with the guidelines and operating models concerning occupational safety, identify risks and hazards, and take active measures to prevent them.

We take care of ourselves so that we can also take care of others.

## Remember:

- Safety includes both physical and psychological safety.
- We prioritise safety and promote a safe and healthy working environment.
- We familiarise ourselves with the standard safety instructions, processes, and practices, and follow them.
- We identify the health and safety risks and hazards related to our work.
- We report both near misses and actual events.
- We take care of our own well-being and contact our own supervisor or occupational safety representative whenever necessary.



# Impactful and responsible business



## Principle 8

# We respect human rights

At Terveystalo, we are committed to respecting internationally recognised human rights in accordance with the UN Universal Declaration of Human Rights and the International Labour Organisation's (ILO) fundamental principles and rights at work.

As a healthcare provider, we have a unique opportunity to promote human rights and a duty to intervene when human rights are violated. We are committed to identifying and preventing negative human rights impacts in our own operations and value chain.

As an employer, we are committed to ensuring safe, fair, and decent working conditions. We respect the right of employees to organise and to join or not to join trade unions.

We are committed to combating the use of child labour, forced labour, human trafficking, or other forms of modern slavery in our value chain.

### Remember:

- We are familiar with Terveystalo's human rights policy so that we can act accordingly in our own role.
- We promote human rights in our daily work by, for example, ensuring occupational safety and well-being, as well as the realisation of fair employment terms.
- We report human rights violations arising from Terveystalo's operations immediately.

# We use artificial intelligence wisely

Digital solutions, including artificial intelligence, are an essential part of Terveystalo's strategy. We use artificial intelligence ethically and responsibly. Terveystalo's ethical principles for artificial intelligence provide high-level guidance on how we develop and utilise AI in our organisation. We are all responsible for using AI technologies according to Terveystalo's guidelines and policies.

Our values guide our use of AI: we prioritise human rights, health, and well-being, while empowering human agency.

Artificial intelligence will change our ways of working in the future and free up time for more meaningful work. We are committed to using AI in a way that benefits patients and customers, either indirectly through more efficient use of resources or directly by improving access to care, treatment outcomes, and customer experience.

## Remember:

- We use AI technologies that are appropriate for our work and are familiar with Terveystalo's related guidelines and policies.





## Principle 10

# We procure responsibly and take care of our joint assets

We are committed to ethical procurement practices in all purchases and acquisitions, regardless of size. We adhere to Terveystalo Procurement Policy and guidelines in our procurement, and we do not support the grey economy under any circumstances. In our decision-making, we consider our environmental targets, and the total lifecycle impacts of procurement.

We use Terveystalo's resources carefully. We take care of our shared equipment, supplies, premises, tools, and Terveystalo's assets. We protect them from misuse, damage, theft, and loss. By taking care of common property, each of us can contribute to the realisation of Terveystalo's responsibility goals.

We also take care of Terveystalo's intangible assets, such as reputation, brand value, confidential information, intellectual property rights, information systems, and know-how. We apply the same principles to the property and information entrusted to us by customers, suppliers, and other stakeholders.

### Remember:

- We recognise our responsibility when ordering goods and services or approving invoices for payment from common funds. We request additional information if we find any discrepancies.
- We prefer contracted suppliers approved by procurement.
- We purchase only against a receipt and in compliance with our Procurement Policy and guidelines .
- We take good care of the equipment, supplies, information, documents, and other property entrusted to us.

# Our communication is transparent and adheres to all relevant legislation

We are committed to transparent, proactive, and honest communication to build trust among our stakeholders and customers. As a listed company, we always comply with capital market and disclosure regulations in communication, including rules on inside information and financial reporting and related regulations, alongside our internal policies and guidelines. We make sure that our disclosure is up-to-date and equitable. We all comply with the prohibitions on using and disclosing inside information and are familiar with the related guidelines. As a company, we participate in public debate by promoting themes relevant to healthcare reform and taking a stand on them.

When communicating externally, for example on social media, we remember our professional role and do not post, discuss or act in a way that could harm Terveystalo's reputation or business.

## Remember:

- We ensure that the health-related information we share is accurate and up to date.
- We remember our professional role and information security when we speak on social media and in public.
- We do not share Terveystalo's trade secrets or other confidential and secret information.
- We direct questions from the media and press to the relevant communications team.
- We familiarise ourselves with Terveystalo's insider guidelines and comply with the prohibitions on the use and disclosure of inside information. We never misuse confidential information.





## Principle 12

# We identify and report conflicts of interest

We perform all our work duties with integrity and objectivity, with Terveystalo's best interests in mind. We identify situations where our own interests or those of our close relations may conflict with our duties or decision-making, or where an impression of such a conflict could arise. We immediately report potential conflicts of interest and refrain from participating in the preparation or decision-making of the matter if our independence could be compromised or if an impression of partiality could arise externally. In this way, we strengthen transparency, trust, and good governance.

We are transparent in our operations and decision-making. We will not misuse our position, Terveystalo's assets, or contracts to benefit ourselves or our close relations.

A conflict of interest means a situation where your own interests or those of a close relation, for example, a family member or a close friend, may conflict with your duties or Terveystalo's interests. A conflict of interest can arise, for example, if you have a personal financial interest in a matter related to your work tasks, a close relation has a connection to a Terveystalo customer or a potential business partner, your friend's child applies for a job at Terveystalo and you participate in the recruitment process, or if you have a direct or indirect reporting relationship with a close relation.

### Remember:

- We familiarise ourselves with Terveystalo's guidelines on conflicts of interest and act in accordance with them.
- We recognise actual and potential conflict of interest situations. We report the conflict of interest without delay and clearly recuse ourselves from the preparation and decision-making.
- We immediately report to our supervisor or unit director any circumstances that could be interpreted as a conflict of interest.
- We manage and resolve conflicts of interest transparently and in the best interests of Terveystalo.

# We compete fairly and are diligent in our business relationships

We always compete fairly, honestly, and in compliance with competition law. We understand that fair competition benefits Terveystalo, our customers, and broader society. We do not engage in anti-competitive practices, for example, by agreeing on prices or production volumes with competitors, dividing market areas, or exchanging sensitive business information with competitors. We comply with laws, regulations, and internal guidelines concerning competition.

We know our partners and suppliers, and we comply with applicable regulations, including trade sanctions. We comply with legislation related to anti-money laundering. Money laundering refers to concealing the origin of money or property obtained from criminal activity so that it appears to come from a legitimate source.

As a company, we do not participate in political activities nor support political parties.

## Remember:

- We familiarise ourselves with Terveystalo's internal guidelines on competition and act in accordance with them.
- We do not discuss sensitive business information, such as cost and price data or business plans, with competitors.
- We comply with competition rules in any discussions where competitors are present, such as industry associations.
- We immediately leave when the conversation turns to topics prohibited by competition rules and report the matter immediately to the Legal & Compliance team.
- We contact the Legal & Compliance team in the event of uncertainty about competition or money laundering legislation, and when we have reason to suspect our business partner or the origin of their assets.





## Principle 14

# We give and receive gifts with consideration and combat corruption

Gifts and hospitality are, with certain limitations, part of regular interaction and building business relationships. They must be appropriate considering the nature of the business relationship, of reasonable value, and based on an acceptable business purpose. This assessment is always made on a case-by-case basis.

We do not give or receive gifts or other benefits that are intended to, or may appear to, influence decision-making, such as business decisions or recommended care. We also refuse gifts and benefits that have significant monetary or personal value. Even a reasonable gift or benefit can be inappropriate in certain situations, for example, due to the position of the parties, their duties, or the frequency. Such conditions can create expectations or conflicts of interest.

Corruption is the misuse of power and position for personal gain. We have zero tolerance for corruption of any form. We actively combat and prevent it, and we are aware that gifts and hospitality can constitute corruption in specific situations, especially when dealing with public officials.

### Remember:

- We only give and receive gifts that are reasonable in value and appropriate to the nature of the business relationship.
- We ensure that the gift does not influence the recipient's decision-making or create such an impression.
- We refuse gifts if we suspect that something is expected in return or if the gift could create such an impression.
- Gifts should never be cash or equivalent benefits, such as gift cards.
- We do not offer gifts or other benefits to public officials or individual civil servants.

# We care for the environment, near and far

Terveystalo has ambitious environmental and climate goals that concern our own operations and the entire value chain. Each of us needs to understand these goals and how to contribute to their realisation through our own work.

We promote the circular economy and sustainable use of natural resources throughout our value chain. We reduce the amount of waste in our operations and ensure the generated waste is recycled and directed to recovery. We pay special attention to the use of disposable goods and seek more sustainable alternatives whenever possible. We take care of our premises, medical devices, and other work equipment, and strive to extend their lifespan.

We reduce direct and indirect emissions in accordance with our science-based, short- and long-term emission reduction targets. We recycle hazardous substances and chemicals appropriately. We improve the availability of services with digital solutions, simultaneously reducing customer travel and related emissions.

We monitor the development of environmental responsibility in the healthcare sector and continuously improve our ways of working for the good of the environment. We share best practices and promote responsibility throughout our value chain.

## Remember:

- We take good care of equipment and premises, thus extending their lifespan.
- We minimise the amount of waste through efficient inventory turnover and by ordering only as needed.
- We minimise landfill waste by recycling and sorting carefully.
- We avoid unnecessary business travel and emissions from commuting.
- We are all responsible for reporting observed environmental incidents



## We ask for advice when we are unsure what to do

The Code of Conduct provides guidelines for doing what is right. However, in our everyday lives, we face many situations where guidelines need to be interpreted. These questions are designed to help you when you are uncertain.

If the answer to one or several questions is no or if you feel unsure, pause and seek advice from your supervisor. If you feel uncomfortable discussing the matter with your supervisor or your issue is not taken seriously, you can always contact the Legal & Compliance team.

- **Is this legal?**
- **Is this in line with our values and commitments to ethical business?**
- **Is it good for Terveystalo's reputation?**
- **Is this good for my own reputation?**
- **Could I comfortably tell my colleagues about this?**

# We immediately report any observed or suspected misconduct or non-compliance with Terveystalo's guidelines

Every one of us at Terveystalo shares a personal responsibility for upholding our Code of Conduct in our daily work. Terveystalo's management and supervisors are responsible for communicating and implementing the guidelines and for monitoring compliance with them. We encourage Terveystalo employees to contact supervisors, management, or the Legal & Compliance team in situations where choosing the best course of action is unclear. Please report any violations of the Code of Conduct or other misconduct and suspicions thereof as quickly as possible.

If we make a mistake, we admit and correct it immediately. A report made in good faith will not result in harmful consequences for the reporter. All good-faith reports are treated with the utmost seriousness and investigated thoroughly and fairly, using internal or external expertise as needed. Reports concerning potential breaches will be processed with absolute confidentiality, and anonymity will be protected if the reporter so wishes. Failure to report violations of the Code of Conduct or other misconduct may result in disciplinary action, including termination of employment.

## How do I report observations or suspicions?

- Activity contrary to the Code of Conduct or suspicion of such must be reported primarily to a supervisor, the supervisor's supervisor, or Terveystalo's Legal & Compliance team.
- For HR-related matters, the primary contact channel is the HR Business Partners or the employee representative. If the matter concerns bullying, discrimination, harassment, or other inappropriate treatment, a report must be made in accordance with the inappropriate treatment process.
- For matters threatening patient or customer safety or data protection, an incident report must be filed. Everyone at Terveystalo can file an incident report through [this link](#). Everyone outside Terveystalo can file an incident report through [this link](#).
- If the suspicion concerns serious misconduct, or if, due to the sensitive nature of the matter, it is necessary to make an anonymous report, the suspicion can be reported anonymously through Terveystalo's whistleblowing channel via [this link](#).

# Terveystalo