

***FINNAIR***  
**CODE OF CONDUCT**

## **1 INTRODUCTION**

### **1.1 Purpose and scope of this document**

Finnair is an iconic national airline and a respected member of the international aviation community with a solid reputation in safety, quality, and customer service. This is not the case by chance. Throughout our history of 100 years, our business has grown and changed but the objective of making sustainable ethical choices has always been an essential part of Finnair's corporate culture. Our long-term success as a consumer service company, as an employer, as an investment, and as a corporate citizen depends on each of us following our business values and doing our part to uphold our ethical standards.

The purpose of this Code of Conduct is to help us all to comply with laws and regulations and to act ethically and responsibly.

This document describes the ethical standards to be followed by all employees and members of the Board of Directors of Finnair, regardless of location, seniority level, business unit or function. We expect our partners and suppliers to adhere to the same principles as set out in this Code of Conduct, when working for Finnair. All persons bound by the Code of Conduct have the obligation to ensure that they understand how the Code of Conduct applies to them and they must comply with it at all times.

"Finnair" and "Finnair Group" as used herein refer to Finnair Plc and its subsidiaries. "We" as used herein refers to all persons described above.

## **2 ETHICAL BUSINESS WORLDWIDE**

### **2.1 We operate in compliance with the rules**

We act in compliance with applicable local, national, and international laws and with our own policies. The Code of Conduct applies in parallel with the laws and regulations and with the policies and other internal rules defined by Finnair. Where an external or internal rule does not exist, or the rule is unclear, the Code of Conduct can help us in choosing the right course of action.

How we operate as a company and as individuals is based on the principle of doing the right thing in all that we do. This leads customers to place their trust in us, our business partners to do business with us, our shareholders to invest in us, our external stakeholders to respect us, and the best talent to join us in working for Finnair.

Finnair also works towards the adoption of the principles of this Code of Conduct with its associated companies and it expects its suppliers and other business partners to follow Finnair's Supplier Code of Conduct or similar ethical business standards.

### **2.2 We conduct business in the best interests of Finnair**

We avoid situations where our personal interest may conflict with Finnair's interests. We will report to our manager a potential or actual conflict of interest situation. We will never use our position at Finnair to obtain a personal benefit that we would not otherwise get for ourselves, for our families, or for any other person. We refrain from taking advantage of business opportunities that rightfully belong to Finnair and we do not use Finnair's property, or any

information we have on Finnair, for personal gain. We do not trade, nor compete with Finnair, other than as permitted by our policies.

### **2.3 We adhere to fair employment practices and respect all internationally accepted human rights**

Finnair's people are the foundation of our success and bring our business values to life. We care about our people as this is reflected in the way we deliver our customer service. We provide our people a safe, fair, and healthy working environment so that we all have an opportunity to contribute to our highest potential.

We recruit, hire, and retain talent from around the world based on merits and reflecting the markets and consumers we serve. We provide equal opportunities in employment to people regardless of origin, gender, nationality, religion, political opinion, age, sexual orientation, civil status, or disability. We recognize that a diverse mix of backgrounds, skills and experiences drives new ideas and services, which contributes to our success.

We do not accept any form of harassment, violence or safety or security violations.

We conduct our business in a manner that respects international human and labour rights. We respect the human rights as defined in the UN Universal Declaration of Human Rights and basic labour rights defined by the International Labour Organisation (ILO). We respect the freedom of associations and the right to collective bargaining. We do not use child or forced labour, and we do not co-operate with suppliers or subcontractors who use such labour.

### **2.4 We take care of Finnair's property, assets, and information**

We use Finnair's assets effectively and for legal business purposes only. We protect Finnair's assets, including physical property, financial assets, intellectual property and other protected information against damage and unauthorized use or removal. We actively work to prevent, expose and denounce theft, loss, fraud and all other types of crime by or against our company and people.

It is part of our responsibility to ensure the information we have and the digital services we provide are reliable, safe and secure. Information Security focuses on protecting the confidentiality, integrity and availability of these assets and information security risks are part of our risk management. Everyone attends the required information security training and is aware of our end user information security rules. We protect Finnair's and our customer's proprietary and confidential information according to our policies. We do not use or disclose the insider information on Finnair or on other companies which we do business with.

### **2.5 We are committed to data privacy and ethical use of data**

Personal data is data relating to an identified or identifiable natural person. This includes information that enables identification directly or indirectly, for example by combining individual data with some other information.

The purpose of data protection is to protect customers, employees, and other stakeholders against any violation of their privacy when processing personal data.

We process all personal data fairly and lawfully. This means that we respect the following principles in all personal data processing: 1) data is collected, processed, and stored only for specific and lawful pre-defined purposes, 2) data is processed lawfully, fairly and in a transparent manner in relation to data subject, i.e. customer, employee or other stakeholder, 3) data is collected only to the extent necessary for the purpose of processing, 4) data is retained only for the specified time, and kept only according to the defined retention time, 5) data is accurate and up to date, and 6) data is protected by appropriate technical and organisational measures.

Every one of us is responsible for processing personal data with due care and in accordance with the above-mentioned principles, which are explained in our Data Privacy Policy.

Data is an important asset for Finnair, and we use data and analytics to drive efficiency and reliability in our operations and to improve our customer experience and people experience. In developing our data capabilities, we ensure that our principles of handling data are transparent and open, while respecting the privacy of the data subjects. We clearly define the purpose of our data collection, we handle it with care, and we consider the ethical implications of our use of data. Machine learning models we build for Artificial Intelligence reflect Finnair values and all ethical aspects are carefully considered in our AI development.

## **2.6 We show zero tolerance for corrupt activities of any kind**

Corruption means abuse of power for one's own gain. Bribery means offering, giving, or receiving a financial or other benefit for the purpose of influencing a decision.

We do not tolerate corruption in any form. We do not accept nor give gifts or entertainment to obtain an improper benefit or advantage, nor do we give anything of value to government officials where that could influence, or appear to influence, their integrity. We do not make donations or provide any other type of support to political parties or to other organizations or persons belonging to the political system. If we receive gifts or entertainment from anyone other than Finnair in connection with our work, we seek guidance from our manager whether to receive and retain the same.

We do not conduct business with parties that are not willing to provide us with proper information on their business and ownership, nor do we enter into unusual transactions such as making payments to third parties or receiving payments from third parties, without obtaining a prior clearance from the leadership in accordance with the company rules.

## **2.7 We compete vigorously and fairly**

Finnair is committed to free and open competition on the market. We do not seek competitive advantages through illegal or unethical business practices. We never engage in anti-competitive activities or in other situations where free competition is unlawfully prevented, restricted, or weakened. We deal fairly with our customers, service providers, suppliers, and competitors.

## **2.8 We do not compromise when it comes to safety and security**

Safety and security are our top priorities in all operations, and we make no compromises under any circumstances. Everyone shares the responsibility for safety and security. We must all comply with the safety and security

instructions and guidelines provided and assume responsibility for the safety and security of our own work environment. Every Finnair employee is expected to be prepared to identify hazards, prevent damage and, where necessary, act correctly in exceptional circumstances and in response to an accident or other event involving damage. We report any near misses, as well as safety or security violations using the appropriate channels.

## **2.9 We care about our customers**

We treat our customers with courtesy and respect. Customer satisfaction is one of our most important business metrics.

Finnair aims to provide an accessible end-to-end customer experience and deliver excellent service to all Finnair customers, including those who need special attention and adaptation to their particular needs e.g. due to a permanent or temporary disability or age.

## **2.10 We seek continuous improvement in reducing environmental impact**

We strive to be among the leading airlines in the sustainable development of civil aviation. We are aware of our impact on climate, resource use and biodiversity, and we continuously seek to improve the environmental performance of our business by making use of the sector's best practices. We gather, assess and report information about the environmental impact of the services we provide. We are aware of and responsive to corporate sustainability risks and opportunities for our business. We take sustainability into account in everyday decision-making.

## **2.11 We communicate clearly and promptly**

We provide clear and accurate information to the media, financial analysts and the general public. We value open discussion and maintain continuous dialogue with the societies where we operate.

We use our freedom of speech in social media and other media responsibly and respectfully and in compliance with the laws and our policies. We let the specifically designated functions of Finnair to communicate on behalf of Finnair to the media and to the financial analysts.

## **2.12 We act and behave according to the Finnair values**

### ***Working together***

We understand that for us to succeed, we need everyone's input. We trust each other. Working together means reaching towards common goals and collaborating cross-functionally and externally with our partners. We understand the implications of our actions to other teams, and we share to care for each other.

### ***Commitment to care***

We care about our customers and each other. We take responsibility and act responsibly. We are there for our customers by delivering the expected customer experience with high quality. We work together as one Finnair team, respecting and appreciating one another.

### ***Simplicity***

Simplicity is all about how we work together at Finnair. It refers to our processes, openness, transparency, clarity, efficiency, professionalism, low hierarchy, and agility.

### ***Courage***

We have the courage to look to the future with an open mind. Courage is inspiration, creativity, Finnish sisu mentality, and the ability to step up and give feedback.

## **3 WE ALL ARE RESPONSIBLE FOR COMPLIANCE AS WELL AS ETHICAL AND RESPONSIBLE BEHAVIOUR**

### ***3.1 Leadership's responsibility***

The Board of Directors is the owner of the Code of Conduct and other essential policies of Finnair. The management, supported by the Risk & Compliance function, is responsible for enforcing the essential policies by implementing measures and controls designed for the prevention, detection, and correction of violations of the same.

The top management of Finnair has pledged its commitment to - and requires each member of the management and staff to commit to - sound corporate culture that is based on transparency, honesty, integrity and ethical behaviour. Integrity means consistently doing the right thing and choosing the correct behaviour in any given situation.

Individual members of the management are responsible for showing the example and promoting honest and ethical behaviour. They have the duty to know the external and internal rules that apply to their organisation and to ensure that the employees receive appropriate training and guidance.

The management is responsible for creating a positive work environment in which employees feel comfortable raising questions and concerns and reporting any situations that need to be addressed. The management must ensure that employees who report a suspected violation are protected from any form of retaliation for doing so.

### ***3.2 Personal responsibility***

Each of us has an impact on Finnair's ethical culture through our actions. Everything we do or say can shape the culture in a positive or negative way. We have the responsibility to reinforce the ethical standards by our own example. We take the responsibility for our own actions, seek guidance when in doubt, and react promptly to violations.

Every employee must be familiar with the laws and regulations related to their area of responsibility, comply with them, and know the consequences of non-compliance. Any possible non-compliance must be addressed.

We show our courage as individuals and as a company by doing the right thing also under pressure. Even when something might be seen as a common practice in a location we operate, we continue to comply with our rules and Finnair's Code of Conduct.

### ***3.3 Ways to raise questions and concerns***

Compliance with the rules and the ethical standards depends on each employee seeking advice before problems occur and reporting incidents that raise compliance issues. It is vital to address any concerns about possible misconduct promptly and transparently. By raising our questions and concerns, we are

protecting the reputation and integrity of our company, our brand and our people. We must not accept any violations.

When raising a question or concern, your manager may be the closest person to speak to. If you do not feel comfortable speaking to your manager or a higher-level manager, you may also contact your People partner or the Risk & Compliance function ([compliance@finnair.com](mailto:compliance@finnair.com)). A report can also be made completely anonymously via Finnair Ethics Helpline. All reports of potential violations will receive a fair investigation, unless the report is determined to have been made in bad faith. Any attempt to obstruct investigation or to prevent reporting of a violation is considered a violation in itself.

### ***3.4 Consequences of non-compliance***

Finnair is determined to take action if anyone, irrespective of the position in the organisation, violates the rules or the Code of Conduct.

A violation will be disciplined in accordance with the established policies and procedures. Penalties and other consequences are determined by the nature of the violation. Violations of law can be reported by Finnair to the relevant authorities and may give rise to further civil or criminal penalties.

### ***3.5 Retaliation is not tolerated***

Finnair does not tolerate retaliation against any person who in good faith reports a suspected violation. We do not accept reports made in bad faith as they are against our ethical standards. Any person involved in retaliation will be subject to disciplinary action, which may include discipline in line with local laws.