

RETTA

Code of Conduct

Word from the CEO (1/2)

“**We’ve renewed the Retta Group** Code of Conduct, which applies to our day-to-day operations in all Retta business functions and companies in Finland and Sweden. Our work in the field of real estate management and real estate agency is based on expertise and trust.

We ensure the sustainability and responsibility of our business operations by adhering to jointly agreed business principles and ethical practices. At the same time, we are laying the foundations for the company’s future success.

Retta’s vision is to be the leading pioneer in real estate and housing in the Nordic countries, known for its strong internal culture and values, and to provide the best customer and employee experience in the industry through continuous development and improvement.

We all make big and small choices every day. By following jointly defined principles, we can ensure that the Group companies’ good reputation is maintained and strengthened.

Retta’s values are: ‘succeeding together, bold renewal, and acting responsibly’. If we’re to live up to our values, we must have common rules. Shared values, expertise and trust must be reflected in our daily actions everywhere.”

Word from the CEO (2/2)

”**All employees** of Retta are committed to the principles set out in this Code of Conduct.

We also expect all our business partners to act in the same way regarding social responsibility.

We educate our employees about the content of the Competition Act, the Anti-Money Laundering Act, and data protection legislation, as well as prevention of corruption, and we have prepared internal guidelines for these subjects.

Retta has changed and developed significantly in recent years. In view of future growth and expansion, common principles and rules are increasingly important.

I expect all our employees to familiarise themselves with these business principles and to review them from time to time. We expect our partners and stakeholders to commit to these or similar generally accepted ethical business principles.”

Helsinki, December 2021

Kari Virta

CEO

Retta Group



Foreword

The operating standards set out in this Code of Conduct apply to all employees, managers and senior salaried employees of Retta Group Oy and its subsidiaries (collectively, “Retta”), regardless of their work tasks or location.

All Retta business partners must comply as closely as possible with this Code of Conduct in fulfilling their obligations under agreements with Retta.

1 Compliance with laws and regulations

“We are personally responsible for all our actions. As experts, it is important for us to monitor the development of legislation in our area of responsibility and to ensure that our operations comply with the regulations in force.”

In its operations, Retta is committed to complying with all applicable laws, rules and regulations. Key legislation includes legislation on the protection of privacy, prevention of bribery and other forms of corruption, competition, and occupational safety.

2 Personnel and the workplace

“We trust and respect each other as individuals”

Retta respects every individual’s dignity, privacy, and freedom of conscience and religion. Retta treats everyone equally in its organisation. Wages and career advancement are based on everyone’s own achievements, competence and skills.

Retta does not accept any form of discrimination, harassment, threatening, insulting, or violent behaviour. Everyone is expected to behave professionally and respectfully towards colleagues and business partners, both in the workplace and on social media.

Employees must act in a manner that does not harm the reputation of Retta.



2 Personnel and the workplace

Retta respects freedom of association and the right of workers to organise themselves professionally. Joining a trade union or association is a personal decision of Retta employees. However, employees must also act in accordance with Retta's Code of Conduct at these meetings.

Retta promotes a goal-oriented, collaborative and supportive work environment in which employees can engage in an open and constructive dialogue on all work-related issues, and employees can pass things on to their supervisor or Retta's Compliance Team if necessary.



3 Protection of company information and resources

“Prevent, protect and pay attention”

Any information that Retta receives from its contractors, business partners or other business associates that is not in the public domain is considered confidential.

The same applies to the personal data of the managers and employees of the Retta. Retta collects, processes and protects personal data by complying with applicable laws and regulations.

Retta takes appropriate measures to ensure the accuracy, confidentiality and security of data and information. Retta protects personal data against misuse, theft, and improper or unlawful disclosure.

Retta expects the company’s managers and employees to protect all the company’s resources, which may be tangible or intangible assets such as brands. All resources of the company must be used honestly, efficiently and solely for legitimate business purposes.

4 Conflicts of interest, additional work (1/2)

“Retta’s decisions are always made in the best interests of Retta.”

Situations which cause conflicts of interest must be prevented. A conflict of interest arises when an employee’s personal interest, remuneration or relationships may affect the employee’s work within Retta and make it difficult to make decisions in the best interests of Retta.

When a conflict of interest arises or is likely to arise, it must be disclosed transparently and promptly within Retta. The possible or actual situation will be assessed, and appropriate measures will be decided on and carried out if necessary.

4 Conflicts of interest, additional work (2/2)

Examples of potential conflicts of interest to be prevented in general:



Negotiation of a business agreement or conclusion of a business agreement on behalf of Retta if the other party to the agreement is related to the employee or their related party.



Acquisition or control of an interest in a company that is a current or potential supplier, customer or competitor of Retta (this does not apply to insignificant interests with no ability to influence the company's operations).



Receiving a salary or other income from a current or potential competitor, supplier or customer of Retta.

5 Anti-corruption policy

“Zero tolerance in corruption, no excuses.”

Retta does not offer or pay bribes or illicit payments to authorities or other parties or advise or recommend anyone to offer or accept them. Retta does not accept bribes or illicit payments from any source. We intervene in any abuses that come to our attention.

6 Hospitality, gifts, expenses, sponsorship

“We understand ethics in our business.”

Giving and receiving occasional and low-value gifts and hospitality that are openly and appropriately disclosed and do not create or are not perceived to create expectations of consideration are allowed in the business of Retta.



Retta always pays for its employees business trips and accommodation.



Retta’s management determines all sponsorships and donations made by Retta.

7 Competition legislation

“There is no other way.”

Retta promotes fair competition and complies with all the rules and regulations of current competition legislation.

8 Financial transparency and appropriateness

“Money laundering and terrorist financing will not be tolerated.”

Retta does not condone any actions related to criminal activities that aim to conceal the illegal origin of funds (i.e. money laundering).

Retta does not condone the financing of terrorism. Furthermore, Retta does not condone fraudulent acts in any form. This includes deliberately misleading or otherwise unfair means for unjustified or unlawful economic gain or deliberately misrepresenting information that affects financial statements.

The following are also strictly prohibited: misuse or misappropriation of money or assets, theft; tampering with financial statements; destruction, deletion or improper use of data and equipment; and neglecting to report violations of law, regulations or company policies.

9 Communication

“Every action and every word affects the brand.”

Specifically designated individuals are responsible for Retta’s media relations. Retta communicates transparently, precisely and promptly.

Products, services, prices and other information are clearly and truthfully stated in marketing, and no misleading terms are used.

RETta



Violations, reporting and whistleblowing

Violations of this Code of Conduct, Retta policies and practices, or laws and regulations may result in disciplinary action and even termination of employment. Any disciplinary action taken is always reasonable, proportionate to the violation, and in accordance with applicable laws and regulations. Violations of laws and regulations can result in civil or criminal lawsuit.

Suspicious of abuse can be reported in confidence and anonymously by submitting a report through the [whistleblowing channel](#). If an employee suspects abuse, the employee is encouraged to contact their own supervisor first.

Any reports of abuse will be carefully investigated. The reports are processed confidentially by Retta's Compliance Team.

retta

www.retta.fi

Valimotie 17–19
00380 Helsinki

020 780 3780