

Patria Ethical Code of Conduct

*We want to succeed
Our operations are
customer oriented
Together we
create successes*

Patria Ethical Code of Conduct

Ethical operation and its constant development are important in all international business activities but their significance is particularly emphasised in the defence industry.

The Patria way of operating is guided by many different factors and constraints, such as valid laws and provisions in each market, export licence practices and agreements we have concluded with our customers and partners.

In addition to uncompromising compliance with laws, regulations and contracts, observing Patria's values, the Ethical Code of Conduct and other internal guidelines increases our credibility and attractiveness as a business partner and employer, both at home and in the international marketplace. Finnish laws are in line with decisions issued by the Organisation for Economic Cooperation and Development (OECD), the United Nations (UN) and the European Union (EU).

Patria is a member of the United Nations Global Compact, a strategic policy initiative for businesses committed to aligning their operations and strategies with principles concerning human rights, the position of employees, the environment and the fight against bribery.

Patria has unambiguous zero tolerance for bribery, but this zero tolerance also applies to other unethical activities.

The Ethical Code of Conduct provides a background and creates a foundation for every Patria employee's way of working. By operating in the right way, we will also enhance our own working environment and ensure its continuity.

Naturally, we expect our partners to fulfil the requirements of our Code in their own operations.

Heikki Allonen
President and CEO



Ethical Code



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Ethical Code



Our Ethical Code of Conduct, which is applied to all Finnish and foreign Patria subsidiaries, defines how all employees, clerical workers and managers of the Patria Group operate.

In his or her work, no member of Patria Group is entitled to perform, require others to perform, or permit actions that are against the law. Patria has zero tolerance for bribery but also for all other unethical operation. When drawing up contracts with partners, the starting point is that the partners follow the principles of Patria's Ethical Code.

When necessary, the Ethical Code is complemented by more detailed rules and guidelines issued by any Patria Group company, with the proviso that such rules and guidelines do not contradict the Ethical Code.

The Patria Ethical Code of Conduct is available in our Integrated Management System (IMS). It has also been published on Patria's website.

Social Media



Official statements on behalf of Patria are given by the President and CEO and the members of the Board of Management, as well as by the Vice President, Corporate Communications. An official

statement represents the company's opinion on issues related to our company, customers, industry, ownership, services, business operations, strategy or finances.

We hope Patria employees active in social media will remember that only information published on our website is publicly available and that they are permitted to pass on that information alone. All employees are personally responsible for the matters they publish or comment on.

As a general rule, the information available on Patria's intranet should not be discussed in public social media channels. For example, employment issues are confidential, and it is imperative that any shortcomings are discussed within Patria and, first and foremost, with your own line manager. It is also inappropriate to publish any pictures or recordings about events within Patria that violate the privacy of other Patria employees.

The Patria in the Social Media Sphere Guide is available in our Integrated Management System (IMS).

Guidelines on Related Parties



Patria's Guidelines on Related Parties' Transactions shall be applied to all persons in the employ of Patria who exercise decision-making power (e.g. within the scope of approval authorisations granted by Patria), or who could significantly

influence decision-making. They shall also be applied to members of Patria's Board of Directors and Consultative Committee. However, they shall not apply to business transactions between Group companies.

All employees must personally and actively evaluate whether business transactions conducted by Patria connect to parties related to them. When an employee becomes aware of a business transaction planned by Patria which is connected to a party related to the employee, he or she must immediately report the matter to his or her superior and the party responsible for the preparation of the transaction. Patria does not maintain a register of related parties.

If an employee is uncertain of the applicability of these Guidelines on Related Parties to a transaction under preparation, he or she should contact Patria's General Counsel or one of Patria's legal counsels.

The Guidelines on Related Parties' Transactions are available in our Integrated Management System (IMS).



Public Relations and Donations



Bribery and corruption are forbidden throughout Patria's operations. Neither Patria nor any of its employees may pay or offer bribes or illegal payments.

Moreover, no member of Patria may receive personal benefits or gifts from stakeholders, for example from customers, employees, suppliers etc. wherever such gifts are not in compliance with the applicable legislation and local business practices.

Patria does not give gifts or make donations to political parties, nor does it participate in party-political activities. Furthermore, Patria does not support private individuals in pursuing their political aims.

The Public Relations and Donations Guides are available in our Integrated Management System (IMS).

Sponsorship




Through sponsorship activities, a company can maintain a positive corporate and employer image. Patria handles sponsorship on a centralised basis. The Communications department obtains the approval of the Board of Management for the donation and sponsorship plan in the autumn of each year.

In addition to a few main sponsorship targets, Patria provides modest support for studies and leisure activities related to the industry and its operating environment. In the name of impartiality, we do not support private persons or their activities.

The Sponsorship Guide is available in our Integrated Management System (IMS), and instructions on how to apply for sponsorship can be found both in the intranet and on our website.

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Safe and Enjoyable Working Environment

 In their work, every Patria Group employee is required to act in such a way that they present no threat to the occupational health or safety of the work community. It is the duty of superiors to actively and systematically improve managerial practices in line with Patria's values and Ethical Code.

Work conditions are developed in order to promote employees' mental and physical well-being, while also taking individual needs into account.

Harassment at work or in the working environment is forbidden.

Any shortcomings in occupational safety or the working atmosphere should be reported to your superior. Each superior should ceaselessly work towards a better working environment.

Equality

 Patria is committed to treating all employees in an objective, impartial and equal manner. Every Patria employee should promote equality and non-discrimination in their behaviour and actions. Supervisors act as examples and, if necessary, intervene if misconduct is discovered. In addition, the occupational safety organisation and representatives selected by personnel for positions of trust are responsible for ensuring that equality and non-discrimination are put into practice.

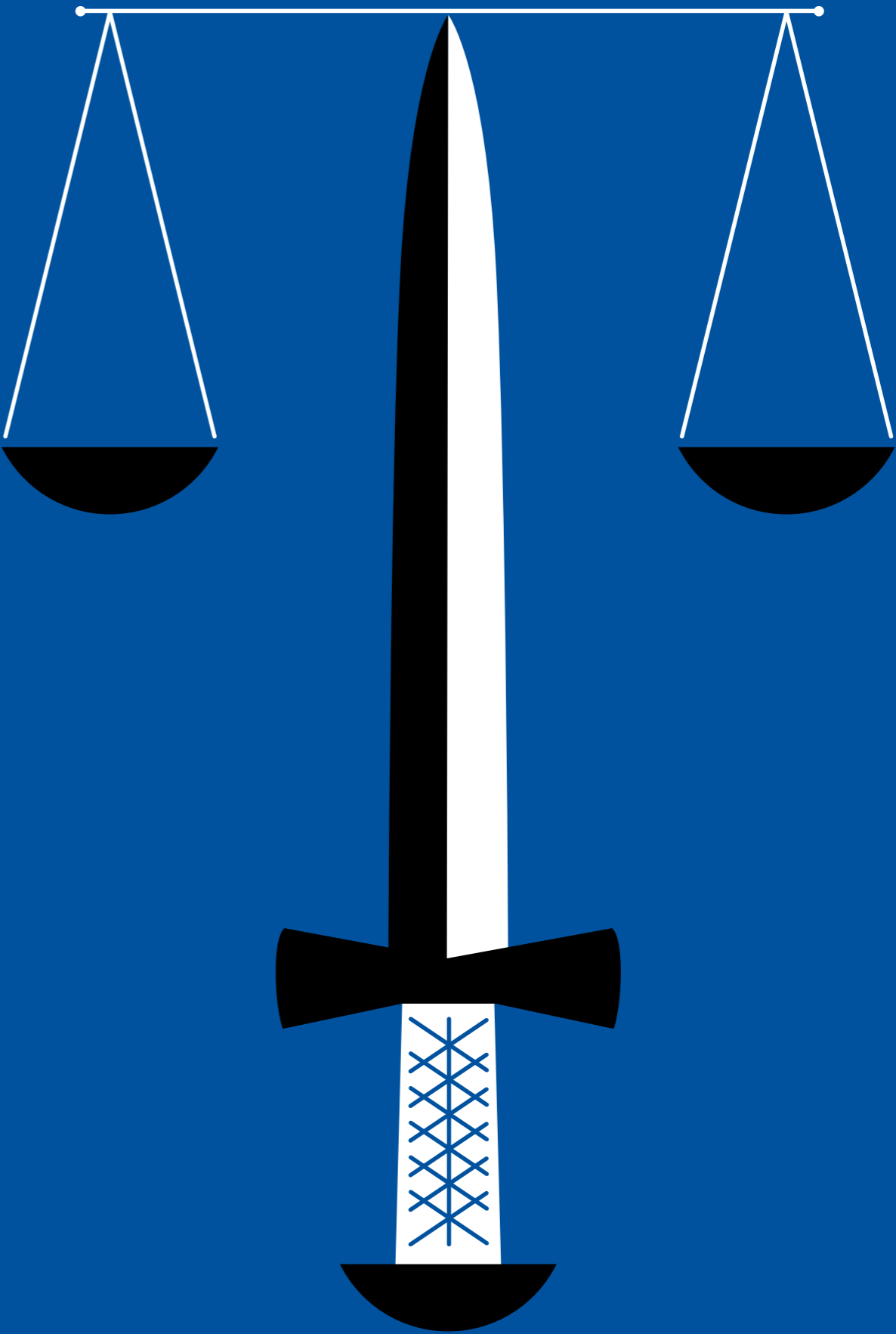
Upon recruitment, the person deemed best for the position is selected for the job. When positions are being filled, it must be ensured that more qualified persons are not unjustifiably bypassed on the basis of gender, for instance. Recruiting may be limited by national defence or safety cases related to Patria's business areas. When recruitment is planned, suitable persons should first be sought from inside the company.

The organisation of work takes the employees' individual competences into account. Each employee is provided with equal opportunities to proceed in their career at all levels of the organisation.

The integration of work and family is supported by flexible working time arrangements, among other solutions. Men and women have an equal right to family leave, caring for sick children and other rights supporting the welfare of families, as provided for under legislation.

All kinds of discrimination at work are forbidden.

The Equality Plan is available in our Integrated Management System (IMS).



Products and Services



Patria's operation is based on long-term customer relationships and provision of high-quality products and services. We measure and analyse the results we attain on a regular basis in order to fulfil customer requirements and needs, and improve customer satisfaction. We maintain licences and certificates demanded by laws and customers, and act in the way they require.

Our operation is based on management that is in line with Patria's values, and a quality policy is implemented, for each sector of business, with a management system based on the ISO 9001 standard to which we integrate other necessary system requirements (such as environmental and safety perspectives).

We use regular management reviews and internal assessments to ensure that our management system and its processes are competitive and suitable for the purpose now and in the future. Our employees receive the information, training and resources they need to be able, for their part, to ensure the delivery reliability of products and services, maintenance of quality and development of operation.

We use process improvements and innovations, which originate with changes to the business environment and based on the key goals of the organisation, to constantly develop our competitiveness as well as the safety and quality of our products and services.

[The Quality Policy is available in our Integrated Management System \(IMS\).](#)

Selection of Business Partners



Patria has guidelines in place with regard to the selection of business partners. The objectives are as follows: selections are transparent, decisions are made in cooperation with the Group and business operations, authentication is consolidated, measures are traceable and the partners are supervised.

Patria's Ethical Code is applied to all business partners, and training related to it is provided for them if necessary. When a business partner is being selected, sufficient checks must be made on the prospective partner's background, reputation, ownership structure, financial standing and level of competence.

Agreements are always standard-form contracts concluded for a fixed term. When concluding an agreement, special attention is paid to the grounds for payment, so that they correspond to the tasks and actions agreed and are within generally accepted limits.

Honesty, integrity, fairness and caution are expected from Patria representatives in all business transactions.

[The Business Partner Selection is available in our Integrated Management System \(IMS\).](#)

Suppliers and Sub-contractors



As a general rule, we co-operate only with partners who are willing to abide by the principles underlying our Ethical Code. We require that our partners abide by the local legislation of any country in which they operate.

Decisions concerning all suppliers and sub-contractors should be made as impartially as possible and with the Group's interests at heart. The supplier and sub-contractor networks are developed in a manner that produces the most cost-effective value to the customers and owners.

[The Procurement Policy is available in our Integrated Management System \(IMS\).](#)

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Safeguarding Corporate Assets



Securing both tangible and intangible assets (such as property subject to the Copyright Act) is vital to successful business activities. Patria employees should only use company property in legal business activities and protect it from harm or unauthorised use. In no circumstances should Patria's property be used in an illegal manner or contrary to instructions.

The Corporate Security Guide is available in our Integrated Management System (IMS).

Data Security



Information is Patria's key asset. Information must always be protected in the appropriate manner regardless of its distribution format or record. The goal is to manage risks in Patria's operations, both in normal and exceptional conditions.

Data security aims at ensuring confidentiality, i.e. availability of information only to those entitled to use it; integrity, i.e. that information is reliable, correct and up-to-date; and usability, i.e. that access to information is undisturbed and the information is usable.


The task of information security operations is to identify intentional and unintentional threats to information, and to prevent and limit the impacts, should the threats materialise.

At Patria, the level of information security is, at a minimum, the minimum level specified in Finnish legislation and by contracts binding on Patria. In business units, individual systems or undertakings information security can be on a higher level, whenever necessary.

The Information Security Guidelines are available in our Integrated Management System (IMS).

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Environmental Issues

 Patria is committed to operating in accordance with the principles of sustainable development, by using natural resources responsibly, and to observing environmental legislation and all corresponding, official regulations. Patria promotes environmental protection and takes active steps to identify and reduce environmental risks. Patria's key offices are covered by ISO 14001 certification.


We aim for efficiency in our use of water, energy and raw materials. We favor recycling within our viable financial limits.

We keep our personnel informed of the environmental status and risks of our operations, as well as the development targets related to this environmental status. Moreover, we strive to systematically improve the environmental expertise of our personnel.

We regularly evaluate our environmental management and environmental conditions at our sites. We decide on corrective measures and set development targets.

Patria has responsible organisations in place, designated for each city/town that manages environmental issues.

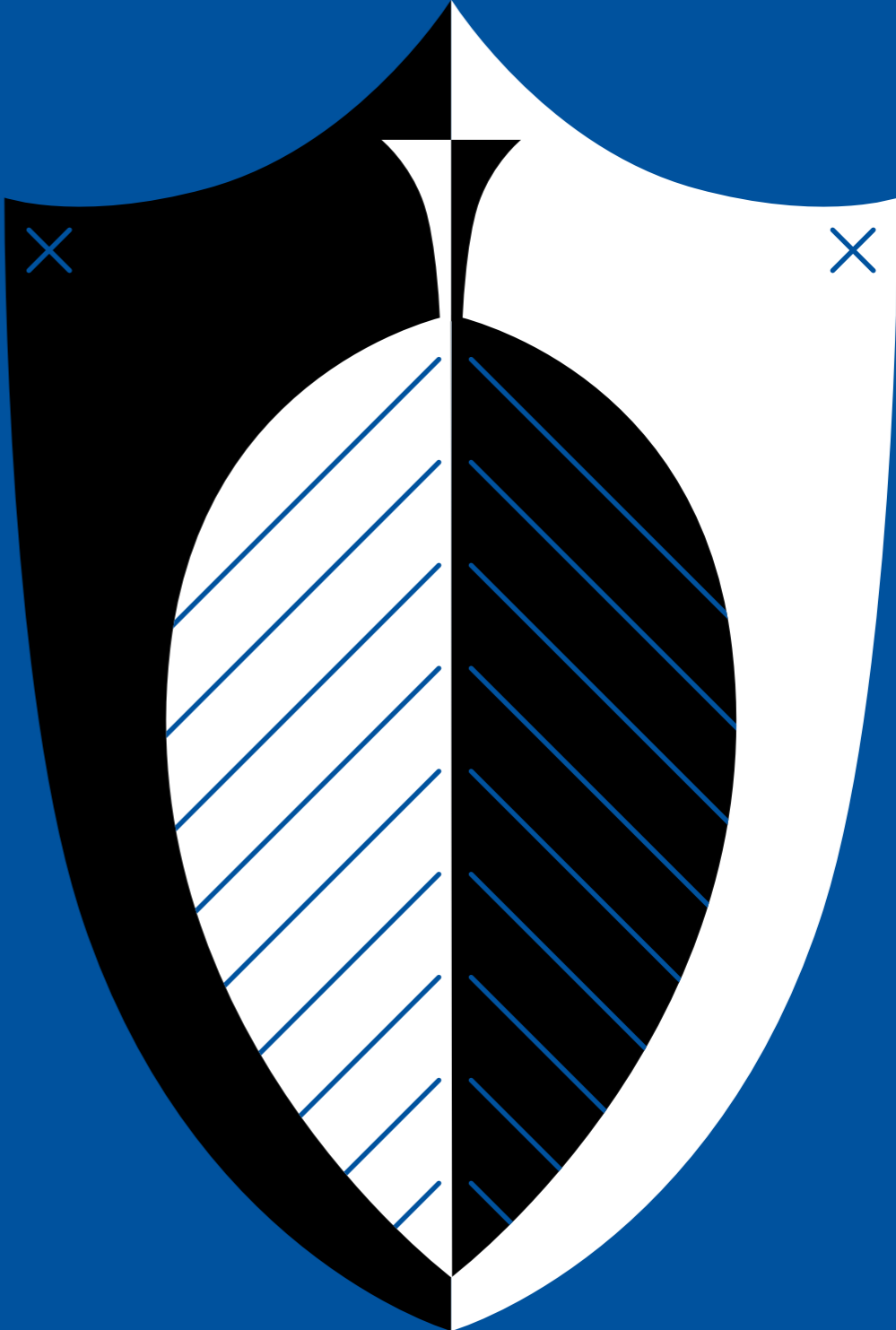
Respecting and Promoting Human Rights

 Through our own actions, we respect and promote human rights as defined in the United Nations Universal Declaration of Human Rights.

We respect freedom of thought, opinion, speech, religion and peaceful assembly.

We do not discriminate against anyone based on their race, age, nationality, gender or sexual orientation.

We do not approve of forced labour or child labour under any circumstances.



Training



All new Patria employees receive training on the Ethical Code during the orientation phase.

All Patria employees go through annual online training on the ethical Code of Conduct.

If You Do Not Know How to Act



Read the relevant guidelines and instructions.

Discuss the matter with your superior, company management or other experts.

Do not forget common sense and your personal responsibility.

Questions and feedback on Patria's Ethical Code and its observance can also be sent by e-mail to the address lakia@patria.fi. You can also give feedback or ask questions anonymously in the intranet, via the Report Alleged Misconduct link. You can always contact legal counsels and the General Counsel.

In Support of a Decision



Even if a decision you make is lawful, it may not fulfil the relevant ethical requirements.

Consider what effects your decision will have on the big picture.

If you are uncertain, ask your superior for advice or contact the General Counsel.

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