

22 April 2026

Vincit Code of Conduct

Our guide to being awesome (and how to use this).

Hey there. This isn't your typical, dusty rulebook written by lawyers. This is our Code of Conduct – a simple guide to how we do things around here. It's based on our values and common sense, and it helps us build a workplace where everyone can feel proud and safe. This Code of Conduct also reflects our commitment to continuously improve our practices in ethical business conduct, occupational health and safety, and environmental protection.

Think of it as our collective promise to each other, our clients, and our partners. It applies to every single one of us, from the newest trainee to the CEO, no matter what our role is. If you ever find yourself in a tricky situation and aren't sure what to do, this guide is your first stop.

And just so we're clear, while the tone is light, the content is serious. Following these principles is a condition of working with us.



We believe in better Mondays.



This is why we exist. A “better Monday” isn’t just about cool projects; it’s about creating a positive impact on the world while taking care of ourselves and each other.

- **For our people:** We support a healthy work-life balance. We’re a workplace: not a family, but a team of professionals who treat each other with respect and empathy. Your well-being matters more than any deadline. You are the expert and decision maker regarding your own balance and well-being. Take this responsibility seriously and take action if balancing is needed, and whenever you need support with it, reach out to your supervisor.
- **For our planet:** We aim to make sustainable choices. Whether it’s reducing waste in the offices, optimizing code for energy efficiency, or choosing partners who care about their environmental footprint, we try to leave things a little better than we found them.
- **For our community:** We want to be a force for good. We encourage you to participate in our communities and use your skills to make a positive difference. Our communities are inclusive, and we want to be good allies to other communities driving positive impact.

We are honest!

Trust is the foundation of everything we do. It's simple: we play fair, we're transparent, and we do the right thing, even when no one is watching.

- **No sketchy deals:** We have zero tolerance for bribery or corruption. We don't offer, give, or accept any shady payments or benefits to win business or influence decisions. If you see or experience anything that isn't right or doesn't follow good governance, please report it. We've got your back. You can, for example, use our Whistleblower process to report suspected bribery, corruption, fraud, or other serious misconduct.
- **Keep it in the open:** Avoid situations where your personal interests could conflict with the company's interests, including secondary employment or starting something that may compete with us. If you think you might have a conflict of interest (for example, if a decision could benefit you personally, your family, or your friends), just raise your hand and talk to your supervisor and step away from the decision-making. Transparency solves most problems, and if it's about a side activity, wait until your supervisor gives the go-ahead.
- **Gifts and entertainment:** We build relationships on trust, not freebies. Giving or receiving a small gift (like a coffee or a modest lunch) is usually fine. Getting an "all expenses paid trip" is not. If it feels too extravagant, it probably is. Follow our policies and guidelines related to this.
- **Follow the law:** This should go without saying, but we respect and follow the laws and regulations wherever we operate. This includes all government, UN, and EU sanctions. We strictly prohibit the use of child labor, forced labor, or human trafficking in any of our operations or supply chains.
- **Political contributions:** We do not make political contributions on behalf of Vincit. This includes direct or indirect donations to political parties, candidates, or organisations that identify themselves as political. Any personal political activities must be kept separate from your work and must not be represented as Vincit's position.



We are always good company.



Being “good company” means being a decent human being. We are a diverse team of individuals, and we celebrate that. Our goal is to create an environment where everyone feels they belong and can do their best work.

- **Everyone is welcome:** We are committed to equality and providing a workplace free from discrimination. Your background, gender, age, beliefs, or who you love don’t matter here – your skills and your character do.
- **Zero tolerance for harassment:** We do not tolerate any form of harassment, bullying, or disrespectful behavior. Period.
- **Speak up:** We encourage an open and supportive atmosphere where it’s safe to voice concerns. If you experience or witness bad behaviour, discrimination, or bullying, please contact your supervisor, People organization, or occupational safety representative. All reports will be handled confidentially. We have zero tolerance for retaliation.

We spend smart and respect our assets.



We're all responsible for the company's success and its resources. This means treating the company's assets – whether it's a laptop, our source code, or company funds – with care and respect.

- **Treat it like your own (the good stuff):** Use company property and money responsibly. Spend smart and think about the long-term value. Follow our procurement policy, and before you buy something, ask yourself: "Is this a good use of our collective money?"
- **Our ideas are valuable:** Our biggest assets are our knowledge, data, code, and intellectual property. Protect them. Don't share confidential information outside the company. This includes our clients' sensitive data.
- **Keep secrets secret:** You'll be trusted with confidential information about our business, our clients, and our partners. That trust is sacred. Handle all data with the utmost care and respect for privacy, both during your employment and after it. For example, sharing screenshots of internal Slack discussions externally is prohibited.
- **Social media responsibility:** When using social media, be mindful that your online presence can reflect on Vincit. We encourage you to be active and share your professional insights, but always do so respectfully. Never share confidential information, and ensure your communications are courteous and constructive. Make it clear when you're expressing personal opinions rather than speaking on behalf of Vincit

We aim to be the most trusted partner.



Our clients and partners aren't just line items in a budget; they're the reason we get to have better Mondays. We earn their trust by being genuinely helpful, transparent, and great at what we do.

- **Honesty is the best policy:** We are straightforward with our clients. We set realistic expectations, communicate openly about challenges, and always act with integrity and in a manner that balances their needs and our responsible business practices.
- **Play fair:** We compete on the quality of our work, not by trash-talking our competitors. We believe in fair and open competition.
- **Choose partners wisely:** We strive to work with partners and suppliers who share our commitment to ethical conduct and sustainability. We also expect our partners to commit to a high level of security, as we do, to ensure the entire supply chain remains secure. We conduct appropriate due diligence on our business partners to ensure they meet our ethical standards and pose no reputational or legal risks to our business.
- **Remember who pays the bills:** Vincit's customers pay our salaries. Let's always treat them with the respect and professionalism they deserve.
- **We practice Digital Security and Safety:** In today's world, security and safe online behaviour are everyone's responsibility. This means we are all vigilant, follow best practices, and integrate security into our thinking and our work to protect both Vincit's and our clients' valuable data and operations.

We keep our digital house in order.



In our line of work, security isn't an afterthought; it's a core responsibility. Protecting our own and our clients' data is paramount.

- **Be security-aware:** Following our security guidelines in both our internal work and our deliveries is of utmost importance to protect our own and our customers' data. A moment of carelessness and deviation from our guidelines can cause serious long-term headaches and erode trust.
- **Protect your gear:** Maintain vigilance when working outside of the office perimeters and never leave your devices unattended. Pay attention to who might overhear you when discussing work-related things in public spaces. Remember to always follow the more detailed guidelines for remote work and security while travelling. When using AI tools in your work, ensure you follow our guidelines.
- **Report it, fast:** If you spot a potential security threat, privacy issue, or just accidentally click on something you shouldn't have, report it to our security team immediately. The sooner we know, the sooner we can react.

Afterwords



We, as individuals, share this responsibility collectively. Each and every one of us should use these guidelines, along with common sense and ethical sensitivity, in our daily work.

This Code is approved by Vincit's Board and implemented by senior management. The CEO and Leadership Team are responsible for ensuring compliance, communication, and continuous improvement.

All employees receive Code of Conduct training during onboarding and at regular intervals. Suppliers and partners are informed about the Code as part of our collaboration process.

The Code is available to the public on Vincit's website and internally on our intranet, ensuring transparency to all stakeholders in accordance with the Directive (EU) 2019/1937.

We regularly review and update this Code to ensure it reflects current laws, international standards, and stakeholder expectations.

By following this Code, we create the kind of workplace, partnerships, and planet we can all feel proud of. That's how we build and keep better Mondays for everyone.

Our commitments align with internationally recognized frameworks, including:

- The **OECD Guidelines for Multinational Enterprises** and the **OECD Due Diligence Guidance for Responsible Business Conduct**.
- The **UN Convention Against Corruption**
- The **ILO Core Conventions** on labor rights and decent work.
- The **UN Guiding Principles on Business and Human Rights (UNGPs)**.
- Universal Declaration of **Human Rights**.
- UN Convention on the **Rights of the Child**.
- Convention on the **Elimination of Discrimination Against Women (CEDAW)**.
- International Convention on the **Elimination of All Forms of Racial Discrimination (ICERD)**.
- The **Paris Agreement** and **Science Based Targets initiative (SBTi)** for climate action.
- The **EU Waste Hierarchy** and **Ellen MacArthur Foundation's Circular Economy Principles**.
- The **Kunming-Montreal Global Biodiversity Framework (GBF)** for protecting and restoring nature.

We strictly prohibit the use of child labor, forced labor, or human trafficking in any of our operations or supply chains.

We expect our contractors and partners (“Contractor”) to operate with the same high standards of integrity to which we hold ourselves. This includes

- Complying with all applicable laws, regulations, and international standards, including those relating to anti-corruption, labor rights, human rights, and environmental protection.
- Maintaining appropriate security measures to protect Vincit’s and its customers’ confidential information and data.
- Prohibiting the use of child labor, forced labor, or human trafficking in their operations and supply chains.
- Having an effective grievance management system in place for protecting their operations and prohibiting retaliation against individuals who raise concerns.
- Promptly reporting any known or suspected violations of this Code to Vincit.
- To complement their systems, contractors may also report suspected violations through Vincit’s Whistleblower process.
- Vincit reserves the right to contractor compliance with this Code.



Vincit Executive Group has signed the
Code of Conduct 4/2026