

Code of Conduct

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Together for Earth and for Us

This code sets out our key operating principles. It tells us the right thing to do and what the principles mean in our work and our interactions with our stakeholders.

This code is based on our strategy and values, which are lived out in everyday actions. We are *bravely curious and innovative*, and we are constantly developing our expertise, operations and operating methods. We are *appreciative and responsible*: each of us takes responsibility for the results, quality and impartiality of our work, a good atmosphere and the sustainable use of natural resources. We also value and respect the expertise of others. We are a diverse community that actively shares and utilizes knowledge and understanding – *more together*.

Together with our customers and partners, we solve significant challenges and develop innovations through applied research. Our stakeholders and partners can trust us to comply with applicable laws and our ethical principles: impartiality, reliability, honesty and responsibility.

We expect these principles not only from ourselves, but also from our partners.

Together, we work for Earth and for Us.

Kimmo Tiilikainen
Director General



We Comply with Laws and Commitments

The Geological Survey of Finland (GTK) is a state research institute that is governed by the Act and Decree on the Geological Survey of Finland.

We comply with all applicable laws in Finland and the countries where we operate. We produce unbiased research data and services for the needs of society and business life to accelerate the transition to a world that is sustainable for both the environment and people.

We are committed to the UN's Sustainable Development Goals (Agenda 2030). In addition, we are committed to the UN Global Compact initiative and its ten principles.

We are committed to following the fundamental ethical principles of reliability, impartiality, honesty and responsibility.

Compliance with laws, commitments and principles means that each of us is responsible for ensuring and, when necessary, determining our compliance with laws and commitments. We also expect a high level of integrity, honesty and ethical behaviour from our partners.

How I will conduct myself

- I will ensure the legality of my operations
 - My actions are in line with GTK's goals and values
 - I act in accordance with ethical principles: reliable, impartial, honest and responsible.
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We Conduct Our Research and Expert Services Following Ethical Principles and Good Practices

Integrity and ethics are the foundation of our research and project activities. GTK is committed to [the guidelines for the responsible conduct of research](#) from the Finnish National Board on Research Integrity (TENK). It is every researcher's responsibility to follow the responsible conduct of research. We conduct research impartially, independently, honestly and responsibly in accordance with high standards of scientific ethics. We follow the principles of open science. Fabrication, falsification, plagiarism or unauthorized reproduction of the results is not acceptable.

We follow the same ethical principles of research in commercial projects as in publicly funded research.

The business relationships between us and our suppliers, subcontractors, customers and other partners are based on mutual honesty and trust.

How I will conduct myself

- I will ensure that the research I conduct is always in line with good scientific practice
 - I will follow our management system documentation
 - I produce impartial, independent and reliable research data
 - I will act in a trustworthy way with partners
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We Do not Tolerate Corruption and Fraud and We Avoid Conflicts of Interest

We have zero tolerance for corruption, including bribery, conflicts of interest, fraud or embezzlement. The most important thing is to prevent corruption in advance. That is why it is important that everyone strives to identify corruption in their own environment and prevent it.

Our personnel must not claim or accept any financial or other advantage that could compromise their independence and impartiality or give any party an unjustified advantage. Even trying to influence in the wrong way is bribery, even if there is no actual influencing. Accepting bribes is prohibited under threat of punishment.

We follow [the Ministry of Finance's guidelines on hospitality, benefits and gifts](#). Everyone must act with discretion when offering or receiving hospitality or a gift. Only customary and reasonable hospitality or gifts are acceptable.

A conflict of interest arises when a person's interests are in conflict with GTK's interests. We take conflicts of interest seriously. Everyone who deals with matters and makes decisions must make decisions in accordance with GTK's interests and obligations and ensure that there are no private interests in the matters to be decided.

We consider potential incompatibilities and close links to outside interests or secondary occupations in our activities. When carrying out any secondary occupations or fiduciary duties, we must avoid situations in which we have to take a position or deal with a matter that concerns GTK's interests or obligations. We respect the freedoms of expression, business and association, which are limited in employment relationships by the prohibition of competitive activity and obligations of loyalty and confidentiality.

How I will conduct myself

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| <ul style="list-style-type: none"> • I regularly discuss with my team what kind of corruption risks there are in your environment • When I give or receive gifts or hospitality, I think about whether they are reasonable and customary, and whether they are given and received openly • I will ensure that accepting a gift or hospitality does not compromise my impartiality and independence • I will avoid conflicts of interest and creating situations that result in exclusion. I will recuse myself if the matter can be expected to bring | <ul style="list-style-type: none"> financial or other benefits to me, a person close to me or a community they represent • I will follow our guidelines on secondary occupations • I will ensure that the expert opinions I participate in are free from potentially conflicting interests • As a private individual, I will act responsibly in situations where GTK may be associated with me • I will consider what the situation would look like to an outsider or in the media |
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We Respect Business Secrets and Use and Protect Information Appropriately

We are bound by the Openness Act and the confidentiality obligations laid down in it. We do not unlawfully use or disclose our customers' or partners' research plans, data or trade secrets to third parties, but treat them as required by their confidential nature.

We process data appropriately and securely, following good data management practices. We have a procedure that we follow to protect the confidentiality of our customers' and partners' information.

We will always process personal data carefully based only on applicable legal grounds.

We comply with data protection and confidentiality obligations and government data security regulations in all processing of personal data. We continuously maintain and develop our expertise in information security.

How I will conduct myself

- I will respect obligations of confidentiality and secrecy
 - I will not discuss confidential matters in public places or on social media
 - I will participate in data protection and data security training
 - I will comply with our guidelines on data protection, security, and disclosure
 - I am responsible for my personal use and access rights and will not make them available to others. I won't leave my phone or other device unattended.
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We Are Transparent and Fair as a Public Procurement Entity

We comply with procurement legislation, the law on client liability and procurement guidelines. We are committed to responsible procurement. We consider economic, social and ecological factors when choosing our contractual partners. We work with trustworthy, ethical partners who operate legally and sustainably.

We are transparent and non-discriminatory and treat tenderers equally in the procurement process. In tendering procedures, we make our procurement decisions based on the criteria we specify in advance. We consider ineligibility

and affiliation issues as part of the responsible procurement process.

We respect and comply with applicable competition laws and rules. We keep our fee-based activities separate from our other activities in our accounting and reporting transparently. Any misuse of public funds is prohibited.

How I will conduct myself

- I will act fairly and transparently in tendering. I will set clear criteria and requirements for the object of the procurement
- Public procurement requires specific expertise, which I will make use of
- I will assess my potential ineligibility myself. In the event of being ineligible, I will recuse myself from participating in the processing, decision-making or preparation of the contract
- I will make sure I know who I am working with by carefully checking the contractor's background before signing a contract
- I will also monitor and assess the contractor's sustainability during the contract period. I will address identified shortcomings
- I will use the electronic procurement system for tenders
- I will use public money in a sustainable and transparent way



We Respect Human Rights and Work Towards a Good Work Atmosphere and Occupational Safety

We respect and comply with human and labour rights. We treat everyone fairly. We systematically promote diversity, equality and equal opportunities among our staff. We do not tolerate harassment, discrimination or any other form of inappropriate treatment. Our recruitment processes follow the principles of non-discrimination and equal opportunity, and we make informed choices based on application criteria.

We operate according to our values. We foster cooperation, support lifelong learning goals, and encourage you to take responsibility for developing your work. We promote work-life balance through flexible working hours and multi-location work.

Our goal is zero accidents at work. We commit to the occupational safety guidelines and work in a way that promotes safety. We will not compromise on complying with our safety guidelines, whether we are working in our own offices or in the field, in Finland or abroad.

How I will conduct myself

- I will treat everyone equally and respect their right to disagree
- If I notice a human rights violation, I will report it to my supervisor
- I will commit to act in accordance with GTK's values in all situations
- I follow mutually agreed practices to promote cooperation and well-being at work
- I will promote a good atmosphere and support my colleagues
- I will carefully follow the occupational safety guidelines and report any safety deficiencies
- If I encounter inappropriate treatment or harassment, I will, if possible, state that I do not approve that type of behaviour and then report to my supervisor
- If I witness inappropriate treatment or harassment, I will intervene in the situation however possible. I will ask the person being harassed if they have been in contact with their own supervisor about the matter



We Care for the Environment and Promote a Sustainable, Carbon-Neutral Transition

Our research promotes the sustainable and responsible use of natural resources. We will promote the green transition and the goal of carbon neutrality both in Finland and globally.

The geosciences play an important role in achieving the UN's Sustainable Development Goals (SDGs). Geology can be used in managing the impacts of climate change, supporting decision making related to environmental change and protection, and ensuring the supply and sustainable use of critical raw minerals. We have selected five SDGs on which we can have the most significant impact. Our work aims to have a positive handprint, i.e. a positive impact on the Sustainable Development Goals. These selected goals are: 6 Clean water and sanitation, 7 Affordable and clean energy, 9 Resilient industry, innovation and infrastructure, 13 Climate Action and 17 Partnerships for the

goals. We will report our progress on these goals annually in our sustainability report.

In our own operations, we aim to minimise the negative environmental impacts of our activities by reducing our footprint. We integrate environmental considerations into our operations according to the principles of our environmental policy. Our environmental goals are:

- Compliance with the central government's common environmental objectives
- Increasing and maintaining the environmental awareness of personnel
- Taking environmental aspects into account in the targeting of data collection and research activities and in the services provided to customers
- Directing outsourced services to suppliers who commit to complying with the operating methods required by GTK's environmental policy
- Appropriate and continuous reduction of the environmental load caused by GTK's own operations, for example, by the following means:
 - Reducing the harm caused by travelling, e.g. by utilising multi-location work and virtual meetings, and by enhancing the use of electronic datasets in data collection, reducing field visits
 - Striving for almost paperless working methods
 - Socially, economically and ecologically sustainable procurement decisions
 - Reducing the harm caused by field activities
 - Improving the efficiency of material use and recycling
 - Taking the energy efficiency of properties into account

How I conduct myself

- I make socially, economically and ecologically sustainable procurement decisions
 - I try to minimize the adverse effects of field operations
 - I will follow our instructions and guides to ensure the protection and sustainable use of the environment
 - I will be climate-smart. For example, I can reduce unnecessary travel and promote environmentally friendly practices and recycling
 - My research will be linked to the UN's Sustainable Development Goals
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Our Engagement with Stakeholders is Open and Effective

Our research promotes a sustainable future and provides unbiased and independent information to support decision-making. We work together with national and international partners and networks.

We share information about our research and results. We follow the principles of ethical scientific communication when communicating our research results.

We identify different stakeholders involved in our activities and listen to them. We are proactive: for example, before fieldwork begins, we inform local and other relevant parties about the start of the research.

We ensure and maintain the trust of citizens and decision-makers in science and research.

We encourage our experts to be visible in the media and social media in their areas of expertise and to bring evidence-based perspectives to the debate. When we influence society, we are impartial and ethical, and we also highlight the uncertainties and limitations of the research.

In our workplace, we support an open organisational culture and encourage active dialogue in line with our Culture Map.

How I will conduct myself

- The solutions and recommendations I propose are based on research. I will ensure that I apply the principles of impartiality and independence in my work
- I will review the communication and interaction guidelines and practices
- In my public activities, I will make my role known when I engage in discussions
- I will engage in dialogue and respect other people's opinions, even if mine differ from theirs
- I will contribute to an open and trust-based culture of dialogue and work atmosphere



How to Report Violations

The principles presented in this code apply to all GTK employees, regardless of their position and duties. It is the responsibility of every GTK employee to intervene in any shortcomings and report them. The supervisor's task is to investigate and take matters forward if necessary.

What to do:

- Report any concerns, suspected misconduct or violations to your supervisor.
- If you have any observations related to research ethics, please contact a Specialist in Scientific Research, who acts as a support person for research integrity. If necessary, report a violation of the responsible conduct of research in accordance with the guidelines of the Finnish National Board on Research Integrity (TENK) on responsible conduct of research.
- Data breaches: contact the data protection officer, tietosuojaavastaava@gtk.fi
- You can use the internal reporting channel to report violations under the Whistleblower Protection Act. You can do so anonymously if necessary.

All reported suspicions will be investigated appropriately, depending on the subject. Reporting will not have negative consequences for the person submitting the report. Allegations of misconduct are investigated confidentially and are only brought to the attention of those necessary to investigate and take action.



Sanctions for non-compliance with the Code of Conduct

Reported observations and misconduct will be investigated. After the investigation has been completed, a decision will be made on possible sanctions for the person guilty of misconduct or violation of instructions.

Financial and personnel responsibilities are determined in accordance with existing legislation and GTK's rules of procedure, financial regulations, and commitments.

Disciplinary sanctions, such as verbal or written reprimands, written warnings or termination of employment, are determined in accordance with existing legislation and GTK's HR management guidelines and processes.

