

GTK/167/00.10/2020

Introduction by the Director General

We provide solutions for more sustainable growth and expertise that serves the interests of our customers, stakeholders and society as a whole. Our statutory background provides that we are an impartial expert organization, independent of our customers. Our business partners and other stakeholders can trust in our compliance with applicable laws as well as with our ethical standards: impartiality, independence, reliability and integrity.

In accordance with our core values we are *bravely curious* and *innovative* and thus constantly developing our expertise, operations and procedures. We are *appreciative* and *responsible* for the results of our work, the quality and impartiality, the well-being of the community and for improving sustainable growth. We are a diverse community that shares and utilises data and understanding *more together*.

GTK's Code of Conduct strengthens our commitment of doing responsible and ethical business. This is a living document that shall be completed where need arises.

For Earth and for Us.

Mika Nykänen, Prof. Director General







CONTENTS

Introduction by the Director General	1
Compliance with applicable laws and regulations	3
Our commitment	3
Integrity in research and consultancy services	3
We do not accept corruption or fraud	3
We respect the business secrets of our customers and cooperation partners	3
Fair and equal treatment and safety of people	4
Transparency and fairness in procurement and business	4
Respecting the environment	4
Reporting on non-compliance	4



Compliance with applicable laws and regulations

GTK complies with all applicable legislation in Finland and the countries where we operate. We are a research institute existing under Finnish law. GTK operates under the auspices of the Finnish Ministry of Economic Affairs and Employment. GTK is not a consultancy company but it is entitled to provide consultancy services.

We all shall also observe GTK's internal guidelines and operating principles, including this Code of Conduct, in all our operations.

Our commitment

GTK is committed to the fundamental principles on impartiality and independence in its operations, respecting human rights, promoting equality and the fight against corruption wherever we are active. Our staff shall share the same mutual commitment towards each other.

All business relations between GTK and our suppliers, contractors, customers and other partners shall be based on mutual honesty, trust and cooperation. GTK expects from them the same high level of integrity, honesty and ethical behaviour as they can expect from us.

Integrity in research and consultancy services

We comply with the guidelines on responsible conduct of research approved by the Finnish Advisory Board on Research Integrity (www.tenk.fi/en). Integrity and ethics are fundamental in both our research and our consultancy services and shall not be compromised. We follow our Quality policy, the objectives of which can be found the Main Document of GTK's Operation and Quality System.

We do not accept corruption or fraud

GTK has zero tolerance of corruption, including bribery, conflicts of interest, fraud or embezzlement. Our personnel must not demand or accept financial or other benefit that may compromise their independence and impartiality or otherwise engage in any form of corrupt practices. GTK adheres to the guidelines issued by the Finnish Ministry of Finance on hospitality, benefits and gifts.

We take conflicts of interest seriously. Persons making decisions in GTK must do so in the interest of GTK and ensure that they do not have private interests in the matters being decided. We comply with all our internal regulations and guidelines on using GTK's funds and assets.

We respect the business secrets of our customers and cooperation partners

We are bound by the Finnish Act on the Openness of Government Activities, including the statutory secrecy obligations provided by the Act. We do not without legal grounds use or disclose to outsiders our customers' and cooperation partners' research plans, data or business secrets but retain their confidentiality.

We have a mature procedure to legally protect the confidentiality of our customers' and cooperation partners' data that all GTK personnel shall comply with.



Fair and equal treatment and safety of people

We treat everyone in GTK in a fair and equal manner. We do not tolerate any harassment, bullying or discrimination at work and shall promote equality. We work to prevent disruptions and to protect our personnel, property, data, premises and the environment against accidents, safety hazards and unlawful interferences. We expect our personnel to act responsibly.

Occupational well-being and safety are important to us. We make no compromises in following our safety guidelines, whether working in our own facilities as well as working in the field, in Finland or abroad.

We treat personal data with due care and only on applicable legal basis.

Transparency and fairness in procurement and business

We comply with the Finnish Act on Public Procurement and Concession Contracts and the applicable procurement guidelines. We strive to treat all our partners equally and do not engage in collaboration that would endanger our impartiality and independence. In competitive bidding processes we award the contract on the basis of grounds announced in advance.

We respect and comply with applicable competition laws and regulations. We separate our commercial activities from our non-commercial activities in a transparent manner in our accounting and reporting. Any misuse of public funds is strictly prohibited.

Respecting the environment

GTK provides solutions for sustainable growth. Our research strives to enhance the use of natural resources in a sustainable manner. We take environmental aspects into account in our operations. GTK's Environmental policy and objectives can be found in the Main Document of GTK's Operation and Quality System.

Reporting on non-compliance

GTK finds it important that all our employees know this Code of Conduct and comply with it. If you observe non-compliance with this Code, report it to your line manager and/or, in matters concerning research integrity to our TENK Research Integrity Adviser, Manager, Science and Innovations, Asko Käpyaho, 029 503 2327, asko.kapyaho@gtk.fi, and in other matters GTK's Legal Counsel Nina Isokorpi, +358 29 503 2130, nina.isokorpi@gtk.fi.