# Our way of working

# CSC Code of Conduct

# 1. Dear CSC employee,

The objective of CSC operations is to promote the operational framework of Finnish research, education, culture and administration. As a non-profit company, it is our duty to foster exemplary transparency, honesty and responsibility. Trust is the foundation of CSC's success. Customers, suppliers, owners and personnel alike must feel certain that we will able to fulfil our commitments and promises in an ethically sustainable manner.

CSC values are the foundation of everything we do. This Code of Conduct translates our values into actions. It describes what we mean by good business practice and healthy interaction with our interest groups, the environment and society at large. This is about more than just avoiding doing the wrong things; we are determined to promote services of good quality in compliance with the highest ethical criteria.

We are all responsible for the reputation of CSC. Therefore we expect everyone at CSC, including the management and Board of Directors, to comply with *Our way of working*. We also strongly encourage all our suppliers and partners to join us in adopting the values described in this Code of Conduct.

Kimmo Koski Managing Director

Mirjami Laitinen Chairman of the Board of Directors

# 2. Operating principles

#### CSC Values

Values are the conscience of CSC. They form the basis for all our decisions. We follow our core values always and in every situation:

#### Responsibly, With care, Together, Expertise

#### Respecting basic rights and the law

We uphold internationally recognised human rights, such as those enshrined in the UN Universal Declaration of Human Rights and the international labour standards adopted by the International Labour Organisation (ILO). We respect the ten principles of the UN Global Compact.

We are aware of the legislation and regulations pertaining to our work and comply with them diligently. We bear responsibility for our actions.

## 3. How we treat each other

Mutual trust and appreciation are vital for the success of CSC. We uphold equality and will not tolerate discrimination, harassment, inappropriate behaviour or intimidation for any reason. CSC is committed to equal treatment of employees in all matters related to their employment relationships. As CSC employees, we will familiarise ourselves with internal guidelines.

We will foster a positive workplace atmosphere through friendly, considerate and polite everyday behaviour. We wish to leverage the strength that grows out of plurality. We help each other to perform at their level of competence. We take care of the professional development of employees and encourage everyone to embrace lifelong learning.

We commit to maintaining and constantly improving the safety of our workplace environment. We comply with CSC occupational safety and health guidelines. We encourage and support everyone in managing the balance between work and leisure time.

CSC respects employees' right of association and their right to be represented by trade unions and other employee organisations. We comply with the universally binding collective agreement valid for our sector. We grant personnel representatives access to any and all information they require for executing their duties and keep in contact with them. We respect each other's right to privacy and handle all personal information in confidence and with due diligence.

## 4. How we work in relationships with customers, suppliers and interest groups

## Our customers

The success of our customers is the key to CSC's success. We and our customers constitute a national infrastructure for research, and we aim to achieve a well-integrated network. We provide customeroriented services at a high level of quality so that their cost-effectiveness impact benefits both the customer and ourselves. We provide accurate and truthful information on the content, use and security of our services to enable our customers to make informed decisions.

We face our risks and the mistakes that we make honestly instead of attempting to hide them. We aim to achieve transparency and open dialogue with our customers. We aim to resolve any conflicts immediately and through negotiation, without placing undue strain on customers.

## Our suppliers

Suppliers are an inseparable part of CSC's service production chain. We require our suppliers of goods and services to comply with the agreements and guidelines governing good business practice and with currently valid legislation and regulations. We do not condone the use of illegal labour in our own work or in the work done by any of our suppliers or partners.

We include societal, environmental and safety criteria in our procurement agreements. We commit to taking corrective action immediately if the ethical integrity of our supply chain is questioned. We require that members of CSC interest groups working in CSC premises are familiar with the safety code for CSC premises and comply with it. We can act as a reference for our suppliers by separate agreement.

# Gifts and hospitality

CSC business operations must be based on objective criteria, and we do not accept any attempts to influence the judgment of any CSC employee or any representative of our interest groups. We comply with the UN Convention against Corruption (UNCAC) and the OECD Anti-Bribery Convention. Moderation must be observed in receiving and offering gifts and hospitality. We never accept gifts of money.

Different cultures define the line between a gift and a bribe differently. An acceptable gift does not instil a debt of gratitude in the recipient nor create an expectation of returning the favour. We always consider what any situation would look like to an outside observer. A gift is something that you can report openly, a bribe is not.

# Conflicts of interest

Everything we do at CSC must be for the benefit of CSC and our customers. We must avoid situations where the interests of CSC may conflict with direct or indirect personal interests. We remove ourselves from actual or potential decision-making situations where benefit may be incurred by ourselves personally, our families, our friends or any corporation or organisation we represent. We discuss and resolve conflicts of interest with our supervisors confidentially and constructively.

We do not provide any direct or indirect support for political party candidates, parties, or political groups. Therefore we do not grant CSC resources to political campaigns or to the promoting of ideologies.

## 5. How we manage CSC assets and information

We protect CSC's material and immaterial property and handle it with care. This property includes but is not limited to premises, equipment, money, office equipment and supplies, communications equipment, IT systems, software, copyright and other information and know-how covered by intellectual property rights. We only use CSC property for legal business and for legitimate purposes. We do not use CSC's insider knowledge, or the possibilities it offers, for personal gain.

We handle the property and business secrets entrusted to us by suppliers, customers or any other third party with the same diligence as we handle CSC's property and rights. Disclosing customer information or other confidential information to outsiders, and using such information contrary to the interests of CSC and our customers, is strictly prohibited.

#### 6. How we build a sustainable future

Promoting sustainable development socially, economically and environmentally is a key factor governing our operations. Our measure of success is how well we fulfil our societal task. Our work adds to immaterial capital, knowledge and expertise.

We are aware of the environmental impacts of our business and take environmental aspects into account in our decisions. In our environmental policy, we commit to assessing and systematically reducing the environmental load caused by our operations. We encourage CSC employees to adopt practices reducing the load on the environment and to develop ecologically sustainable services.

#### 7. How we publicise our operations

CSC communications and publicity must be correct, timely and based on facts. We encourage our employees throughout the organisation to engage in open dialogue. In any substantial decisions with personnel impacts, the CSC management will consult the relevant personnel representative before

making the decision. We inform our employees honestly and without delay of any matters concerning them, including difficult decisions.

Our publicity is accurate and timely. We take a positive attitude to contacts from the media and are prepared to discuss anything concerning CSC in public, though taking into account communication responsibilities. We never issue statements in the name of CSC or lead anyone to believe that we represent the official position of CSC, unless we have been specifically authorised to do so. We exercise due consideration when discussing CSC's matters outside the company – in public forums, in blogs and in the social media.

# 8. Compliance with the Code of Conduct

*Our way of working* applies without exception to all CSC employees, the management and the Board of Directors. Detailed internal guidelines are issued to complement the Code of Conduct. We introduce these guidelines to new employees in induction training, and supervisors regularly review currently valid guidelines with employees. CSC encourages employees to raise any questions they may have concerning the Code of Conduct and to resolve any unclear situations with their supervisor or personnel representatives.

Every one of us is responsible for reporting actions that contravene the Code of Conduct. A report may be made to an employee's own supervisor or to a personnel representative (shop steward, occupational safety and health delegate, personnel representative in administration). We investigate all bona fide reports of non-compliance impartially and in confidence and take any action deemed necessary on the basis of such an investigation. CSC undertakes to ensure that the employee submitting a report on suspected non-compliance will not suffer negative repercussions because of it.

This Code of Conduct was confirmed by the CSC Board of Directors on 19.12.2016. The Code of Conduct is reviewed regularly and updated as needed.