CODE OF CONDUCT

It's all about how we act

9 December 2024

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Message from our Group CEO

Sampo Group's Code of Conduct forms the basis for conduct-related policies and guidelines across the Group. As such, it provides a framework for how we act as Sampo Group employees when we do business with our customers, interact in the workplace, and serve our shareholders and other stakeholders.

Our operational environment is affected by the changing economic and geopolitical situation, developing technology, as well as a growing concern for the climate and the environment. In times like these, it is important to take a stand for what is right and ensure that we uphold our values and commitments to protect our business, customers, and colleagues. The Sampo Group Code of Conduct provides a solid base for us in our daily work and we, as Sampo Group employees, are strongly committed to these principles. Having set high standards for ourselves and our business, we encourage our suppliers and other business partners to do the same.

As always, our focus continues to be on what we do best, i.e. creating value and safety through our understanding of managing risk. Our ambitions are reflected in the Group's values: trust, integrity, and excellence.

Torbjörn Magnusson Group CEO Appendix

Background

Sampo plc, as the parent company of the Group, provides its subsidiaries with a framework of general principles, within which the parent company expects the subsidiaries to organise and carry out their businesses. These principles are manifested in the Code of Conduct, Compliance Principles, Remuneration Principles, and Risk Management Principles, which form the core of Sampo Group's internal governance framework. The principles are reviewed annually and approved by Sampo plc's Board of Directors. Internal and external stakeholders are consulted during the review process, as considered necessary.

The principles aim to ensure that corporate governance is reliably organised at each Group company and that core practices are of the highest standard and coherent throughout the Group. On the basis of, and in compliance with, the groupwide principles and applicable laws and regulations in respective jurisdictions, each Group company designs, implements, and oversees its own company-specific policies, governance, operational procedures, and risk management frameworks, which are aligned with the group level principles.

Sampo Group communicates its objectives and activities related to the topics covered by the Code of Conduct in its sustainability reporting and on its websites.

All the group level principles are available at:

www.sampo.com

Scope

This Code of Conduct applies to all companies belonging to Sampo Group in all countries of operation. It is the personal responsibility of every Sampo Group employee to comply with the Code of Conduct. The Group companies offer regular training (e.g. e-learning, workshops) on the topics covered by the Code and are committed to communicating the topics to their employees.

Sampo Group expects its suppliers and other business partners to comply with the principles of this Code of Conduct throughout their own operations and supply chains. Therefore, this Code of Conduct is also the group level guidance document on supplier codes of conduct or similar for the Group companies. The Group companies are committed to communicating the topics covered by this Code of Conduct to their external stakeholders (e.g. through supplier codes of conduct, training) and will ensure that adequate measures are taken to verify compliance with the Code of Conduct (e.g. through questionnaires, site visits, and audits) as relevant.

Failure to adhere to the principles presented here can expose us, our colleagues, and the Sampo Group companies to reputational risk, as well as legal and regulatory sanctions. Any breaches of this Code of Conduct must be rectified without delay. Inappropriate business or personal conduct that is considered a potential or actual violation of these principles must be reported to a leader or through a formal whistleblowing channel. Any breach of Sampo Group's internal rules may result in disciplinary action (e.g. notice, warning, or dismissal) and/or reduced variable compensation.



The Code of Conduct also reflects Sampo Group's values of trust, integrity, and excellence.

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"We provide safety, well-being, and financial security in society"



We comply with all relevant legislation and rules

Sampo Group complies with locally applicable legislation and the rules and regulations of competent authorities in all its activities. Sampo Group's parent company, Sampo plc, as a publicly listed company, also fully complies with the Finnish Corporate Governance Code, the rules of Nasdaq Helsinki, Nasdaq Stockholm, Nasdaq Copenhagen, and other essential exchanges, applicable securities market legislation, and authority regulations based on such legislation.

Sampo Group supports the UN Global Compact and implements its principles into the Group's principles, policies, and business practices.

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Our products and services must meet customers' evolving needs

The Sampo Group companies should always strive to act in the best interest of their customers, offering products and services that customers need and want. The products and services should be fair, comprehensible, and designed to help meet the evolving needs of all customers. In addition, the Group companies should aim to take environmental, social, and governance (ESG) considerations, including climate change, into account in product and service development, insurance underwriting, and supply chain management. The Sampo Group companies should ensure that all customers are treated fairly and that no individual customer is given preferential treatment at the expense of other customers. The Group companies should only base their insurance premiums on relevant data and not on discriminating factors, such as sexual orientation, religious belief, or ethnic background.

The Group companies must take appropriate care to ensure that customers are given transparent and easily accessible and understandable information about the costs, risks, and conditions relating to the product or service in question, as well as the reasons leading to a decision regarding an application, where applicable. The Group companies also need to ensure that suitable products are sold to each individual customer in line with their specific risk profile.

Sales, marketing, and product information of the Sampo Group companies must be professional, comprehensive, accurate, balanced, and never misleading. In addition, the Group companies must refrain from using small print and coercive tied selling.

The Sampo Group companies are committed to fair and easy claims handling. It should also be easy for customers to provide feedback on the products and services, and make a complaint if they are dissatisfied with the handling of their claim.

We are committed to making responsible investments

ESG issues, including climate change, have an impact on the performance, risks, and value of all companies. Hence, the Sampo Group companies must take these issues into account in investment analysis, decisionmaking, reporting, and engagement activities.

The Sampo Group companies must monitor and manage investments for sustainability risks by utilising various ESG strategies, such as ESG integration, screenings, and active ownership. In addition, the Group companies should continuously strengthen ESG considerations in their investment management and operations.

Data privacy is a top priority for us

Compliance with relevant national legislation, together with the provisions and principles laid out by the European General Data Protection Regulation (GDPR) is required from all Sampo Group companies. Personal data is business critical for Sampo Group and it is collected only for the explicit and legitimate purposes necessary to carry out business. This data must never be further processed in a manner that conflicts with these purposes. Sampo Group is committed to obtaining and processing personal data in a lawful, fair, and transparent manner, while respecting human rights in all aspects of data management and with explicit consent of the data subject where required. The Group companies obtain, process, store, and retain personal data in compliance with all relevant data privacy laws.

Personal data is not sold, rented, distributed, or otherwise made available to any third party for marketing purposes. Sampo Group may transfer personal data to third parties, when the legitimate interests of any Group company or of a third party so require. Sampo Group may share personal data with third parties, when the data subject has given his/her consent to the sharing, or when the data sharing is permitted or obliged by applicable laws. Sampo Group expects its suppliers and other business partners to comply with the same principles.

All Sampo Group companies should aim to ensure that the privacy of the employer, employees, customers, and other stakeholders is not breached, and that data privacy training is offered to all employees and contingent workers of the Group. The Group companies also ensure that incident investigation and processes for corrective actions are in place.

The group level guidance document regarding data privacy is the Sampo Group Data Privacy Statement, which is available at:

www.sampo.com



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We are committed to high levels of information security and cybersecurity preparedness

Information security and cybersecurity are key areas for Sampo Group. The Sampo Group companies perform regular risk analyses, conduct continuity planning, and have effective internal controls, high-quality systems, and infrastructure to ensure information security and cybersecurity preparedness. The Group companies measure their performance regularly and are committed to continuous development. At Sampo Group, requirements in relation to information security and cybersecurity are set and expected to be met by both internal and external stakeholders (e.g. third-party data processors).

All Sampo Group employees must adhere to the highest standards of information security and cybersecurity by following internal rules and guidelines, using appropriate tools, and always acting responsibly. The Group companies acknowledge the risks related to information security and cybersecurity and must therefore ensure that suitable training is provided to all their employees and contingent workers.

The group level guidance document regarding information security and cybersecurity is the Sampo Group Information Security Principles, which is available at:

www.sampo.com

We do not disclose confidential or inside information

As a publicly listed company, Sampo plc complies with the Finnish Securities Market Act and the EU Market Abuse Regulation, as well as other applicable inside rules and guidelines prohibiting employees, management, and members of the Board of Directors from engaging directly or indirectly in insider trading, or unlawfully disclosing inside information or other confidential information.

The group level guidance document regarding inside information is the Sampo Group Guidelines for Insiders, which is available at:

& www.sampo.com

Our communication is accurate and transparent

Sampo Group's goal is to produce accurate, reliable, relevant, coherent, sufficient, and up-to-date information about the development, strategy, and financial position of its businesses, taking into account applicable laws and regulations, the rules of Nasdaq Helsinki, Nasdaq Stockholm, Nasdaq Copenhagen and other essential exchanges, and Sampo Group's internal guidelines.

The group level guidance document regarding communication is the Sampo Group Disclosure and Communication Policy, which is available at:

& www.sampo.com

We are a responsible and significant taxpayer

Sampo Group is committed to compliance with the letter and the spirit of applicable tax laws, rules, and regulations in all jurisdictions where it conducts business. Each Sampo Group company must pay its taxes in the countries in which its actual business operations take place. All taxes must be paid on time and the Group is committed not to transfer value created to low-tax jurisdictions. All forms of tax avoidance (e.g. through transfer pricing) are strictly prohibited and the Group is committed to undertake transfer pricing using the arm's length principle.

Sampo Group's approach to tax risk management is consistent with and embedded in overall risk management. Sampo Group identifies, assesses, monitors, and manages tax risks to ensure that they remain in line with the business and strategic objectives, taking into account the Group companies' appetite towards tax risks.

Sampo Group does not practice tax planning or tax structuring that would aim to artificially reduce the Group's taxable income. With regard to tax-related issues, the Group companies must operate within the framework of legislation and legal practice in planning the taxable profit of the Group companies. In addition, the Group companies' accounting must always follow local laws and generally accepted accounting principles.



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"Professional ethics in everything we do"

We avoid conflicts of interest

Sampo Group's employees, suppliers, and other business partners are always expected to act in the best interests of the company. No one employed by Sampo Group may use their position at the Group to promote self-interest. In situations where personal interests may conflict with the interests of Sampo Group, employees are required to abstain from decision-making and assign the issue to a non-conflicted person.

If a Sampo Group employee wishes to take up secondary employment, an additional profession, or act as a self-employed person, they must request and receive specific permission from their leader. Such secondary employment or any of the other activities described above must neither interfere with nor cause any conflict of interest between Sampo Group and the employee.

We defend against money laundering and terrorist financing, and we work to prevent crime

All Sampo Group companies comply with the applicable local anti-money laundering and counter-terrorist financing rules and legislation, as well as various sanctions regimes that have been implemented by the United Nations (UN) and/or the European Union.

When providing insurance services, the Group companies must always follow authority regulations and required

due diligence to prevent money laundering, terrorist financing, and other illegal activities. The Group companies must never enter into business relationships with customers, business partners, or other stakeholders who act contrary to the law or principles of sound business practices.

In order to meet the requirements of applicable legislation concerning the prevention of money laundering and terrorist financing, the Sampo Group companies must have sufficient controls, procedures, and training in place to ensure they prevent the use of their services and/or products for money laundering and terrorist financing purposes.

The group level guidance document regarding antimoney laundering and counter-terrorist financing is the Sampo Group Guideline for Required Internal Procedures to Prevent Money Laundering and Terrorist Financing, which is available at:

www.sampo.com

We say "no" to corruption and bribery

Corruption, the abuse of entrusted power for private and/or corporate gain, can take many forms, such as bribery, excessive business entertainment, facilitation payments (i.e. financial payments that are made with the intention of expediting an administrative process), kickbacks, extortion, fraud, embezzlement, Contents Introduction Business principles Professional ethics Fair workplace Environment and climate Appendix

and collusion. Sampo Group is a signatory of the UN Global Compact and thus committed to work against corruption and bribery. Sampo Group does not accept any kind of conduct that could create the appearance of improper influence and expects its employees, customers, suppliers, and other business partners to behave in the same way. Employees must ensure that all payments to and contracts made with third parties are appropriate, for a legitimate business reason, and correctly recorded. The Group companies ensure that they have sufficient internal controls for preventing and detecting corruption and/or bribery, that suspicious incidents are reported and investigated, processes for corrective actions are in place, and training is provided for employees.

Gifts and hospitality without dependence

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Only customary gifts and other such benefits may be given and received in relationships connected to work. Accepting a gift or other benefit must not lead to any kind of relationship with or dependency on the party presenting the gift. The applicable standards are evaluated in accordance with the legislation and legal practice of each jurisdiction.

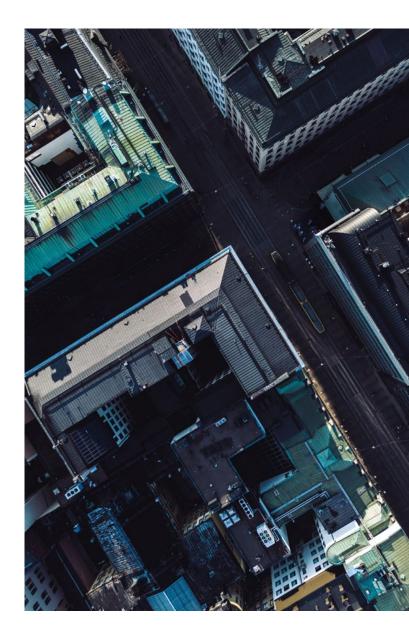
We do not engage in dishonest and unfair competition

Dishonest and unfair competition will distort the markets and prevent healthy economic development. Such behaviour is never accepted at Sampo Group. The Group's policy is to compete in a way that is compliant with all applicable anti-trust and competition laws in every jurisdiction in which the Group companies operate. Anti-competitive practices, such as cartels and abuse of dominant market power, are prohibited. The Sampo Group companies provide training on competition issues to employees and management to raise awareness of the importance of compliance with all applicable competition laws and regulations.

The Sampo Group companies must treat their competitors respectfully and appropriately in competitive situations. The Group companies must not fix prices, agree on market shares, or engage in such activities with their competitors.

Company assets are for legitimate purposes only

Sampo Group employees may only use company assets for legitimate business purposes or other approved purposes and should always take precautions to protect company assets and property from misuse, waste, damage, or theft.





We are an active member of society without political commitments

At Sampo Group, political involvement of any kind (e.g. participation in political activities and direct or indirect political contributions, such as financial donations or contributions, loans, sponsorships, and support of organisations funding political campaigns/parties) is prohibited if it is done on the company's behalf.

Sampo Group employees have the right to participate in political activities and may volunteer their own time and resources to support the candidates and political parties of their choice. However, these activities must in no way suggest that Sampo Group or any of the Group companies are supporting or financing the political candidate or party in question.

Sampo Group supports the transparency and integrity of lobbying practices to openly declare the Group companies' business interests and to prevent any conflict of such practices with public international conventions that Sampo Group supports (e.g. ILO, OECD, Paris Agreement) or Sampo Group's commitments (e.g. UN Global Compact, UN PRI).

The Sampo Group companies must not obtain or try to obtain information or any decision in a dishonest manner, or to misrepresent themselves with the aim of misleading third parties and/or employees of public authorities. Furthermore, the Group companies must ensure they do not induce any employees of public authorities to contravene the rules of behaviour that are applicable to them and ensure they respect their obligation of confidentiality.

The Group companies may engage either directly or indirectly with policymakers on relevant topics. All activities influencing policy, including any political engagement conducted by third parties, must be aligned with Sampo Group's principles and public commitments. Sampo Group does not lobby against climate regulations.

Sampo Group always aims to be transparent in regard to donations and/or lobbying expenditures.





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"We promote a fair and safe workplace"



We respect human rights

Sampo Group complies with all applicable human rights, labour, and employment legislation. In addition to national laws and regulations, Sampo Group is committed to respecting human rights as set out in the International Bill of Human Rights including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic. Social and Cultural Rights, and those stated in the core conventions of the International Labour Organization (ILO). Sampo Group also adheres to the principles of the UN Global Compact and is committed to following the internationally recognised standards on business and human rights, such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Hence, Sampo Group is committed to the obligations related to human rights and the continuous development of related practices (e.g. human rights impact assessments, human rights due diligence processes) covering both its own operations and its value chain.

Sampo Group's approach to respecting and upholding human rights is inspired by the UN Guiding Principles on Business and Human Rights, which, among other things, means that Sampo Group has a responsibility to:

- Avoid causing or contributing to adverse human rights impacts through its own activities, and address such impacts when they occur.
- Apply relevant risk management procedures to prevent and mitigate adverse human rights

impacts that are directly linked to own operations, products, or services by business relationships, even if Sampo Group has not contributed to those impacts.

The Sampo Group companies should acknowledge vulnerable groups and groups at risk of human rights violations in their own operations and in their value chains. Vulnerable groups and groups at risk of human rights violations can include, for example, children and seniors, migrant workers, women, people with impaired intellectual, sensorial, or physical abilities or mental health concerns, autism or disabling chronic diseases, people who are not native speakers of the local language, indigenous people, and people subject to modern slavery.

The Sampo Group companies should aim to prevent complicity in human rights violations through their insurance and investment activities and monitor and report on human rights matters. The Group companies should also ensure that incident investigation and processes for corrective actions are in place.

Sampo Group commits to paying an adequate wage to its own workforce and strives to limit excessive working hours of its employees. Sampo Group also expects its suppliers and other business partners to respect human rights and comply with applicable laws and regulations. This includes, for example, paying an adequate wage, providing safe working conditions, complying with maximum working hours, and prohibiting discrimination and harassment (e.g. verbal, written, physical, or visual). The Group companies ensure compliance with the Code of Conduct e.g. through questionnaires, site visits, and audits.

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We treat everyone fairly and equally

The Sampo Group companies must respect each individual's human rights and not tolerate any kind of discrimination, bullying, harassment, including sexual harassment, or any other type of abusive behaviour. At Sampo Group, all employees must be treated fairly and equally. Discrimination is strictly prohibited, for example, on the grounds of age, disability, national extraction or social origin, racial and ethnic origin, colour, family commitments (including pregnancy), gender, gender identity, political opinion, employees' representative activities, religion, sensitive medical conditions, sexual orientation, or any other personal characteristics.

Discriminatory practices regarding recruitment, job assignment, training and development, promotion, remuneration and other benefits, or general conduct in the workplace, are not tolerated. The Sampo Group companies should also be committed to gender pay equality.

Sampo Group is committed to act against any form of discrimination. Ignorance and inaction in relation to discrimination matters are not acceptable.

We have high health and safety standards

The Sampo Group companies must ensure high standards regarding safety and mental and physical health. The Group companies are committed to reducing and preventing the number of work-related accidents, occupational diseases, and the rate of absenteeism. In addition, employees have a duty to take every reasonable precaution to maintain a safe and healthy working environment and to avoid the risk of personal injury or putting others' safety at stake.

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The Sampo Group companies must promote the health, well-being, engagement, and professional development of their employees. This includes supporting and promoting competence development, developing leadership practices, and providing a healthy and safe workplace, e.g. by ensuring good ergonomics.

The Group companies must have well-defined organisational structures and responsibilities to support the proactive management of health and well-being. This includes, for example, objectives, programmes, training, awareness-raising, and consultation with and participation of employees, and, where they exist, employees' representatives. The Sampo Group companies should also be committed to continually developing their health and safety management.

We respect freedom of association and the right to collective bargaining

The Sampo Group companies must guarantee the effective exercise of trade union rights in the workplace. Sampo Group employees must be free to join organisations of their choice that represent them and which are consistent with local organising laws. These organisations may, if recognised as an appropriate agent, engage in collective bargaining according to the applicable legal regulations.



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The Sampo Group companies must respect and protect employees' representatives. Those employees who act as representatives are not to be discriminated against, disadvantaged, or favoured in any way.

In locations where employees have decided not to appoint representatives, the Sampo Group companies must promote direct and open communication between employees and management.

Sampo Group expects its suppliers and business partners to respect the freedom of association and right to collective bargaining.

We have a zero-tolerance policy regarding forced, compulsory, and child labour

Sampo Group strongly condemns all forms of forced and compulsory labour (e.g. slavery, slavelike practices, various forms of debt bondage), as well as child labour and modern slavery (e.g. human trafficking) as defined by the International Labour Organisation's core conventions (Minimum Age, Forced Labour, and the Abolition of Forced Labour), and is committed to the abolition of such practices. The Sampo Group companies must take necessary and appropriate measures to identify, avoid and/or tackle forced labour, child labour, and modern slavery in their own operations and value chains.

We have an entrepreneurial mindset with encouraging and rewarding working conditions

The Sampo Group companies should aim to provide a diverse, non-discriminatory, agreeable, and open working environment, which encourages entrepreneurship, and where commendable performance is duly rewarded. Sampo Group is committed to ensuring employment security and responsible workforce restructuring (i.e. the avoidance or minimisation of compulsory redundancies, responsible redundancy procedures, measures to mitigate the consequences for employees who have been made redundant, cooperation with employee representatives), as well as limiting the use of non-regular employment e.g. for specialised non-core activities. The Group companies should also aim to anticipate short-term and longterm employment needs and skills requirements.

At Sampo Group, all employees must have a written contract of employment with mutually agreed terms and conditions, including notice periods on both sides. All employees must also be entitled to a fair compensation aligned with market salary practice, working hours, facilities, holiday leave, and maternity, paternity, and parental leave in accordance with the legislation of the country where they are employed. All employees must be provided with appropriate job skills training that is compatible with their individual career paths.

Sampo Group's remuneration strategy is responsible with regard to both employees and shareholders. The starting point of any compensation mechanism is to encourage and stimulate employees to consistently do their best and exceed their targets. However, compensation mechanisms must not generate conflicts of interest and must not entice or encourage employees to engage in excessive or unwanted risk-taking.

The group level guidance document regarding remuneration is the Sampo Group Remuneration Principles, which is available at:

🖉 www.sampo.com



You have the power to improve your workplace. Use it and always treat others with the utmost respect. SAMPO 🗲 GROUP

Environment and climate:

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Good Dusiness is about doing good for the world

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"We are committed to a sustainable future"

We take the environment, climate, and biodiversity into consideration

Sampo Group complies with the existing legislation and regulations regarding the environment, climate, and biodiversity. Sampo Group is committed to protecting the environment and combatting climate change and supports the Paris Agreement.

Sampo Group aims to raise awareness, encourage participation, and train employees on environmental and climate matters. To this end, the Group companies should improve and monitor their environmental and climate performance as follows:

- By integrating environmental and climate considerations into own operations and business activities
- By reducing the consumption of resources (e.g. energy, water) and improving the efficient use of those resources
- By reducing pollution, emissions, and waste generated from business operations, while incorporating the concepts of reduction, re-use, and recycling
- By consulting and cooperating with stakeholders on environmental and climate-related issues

- By promoting and undertaking initiatives to encourage greater environmental responsibility and a sustainable future
- By working to increase transparency and raise awareness regarding biodiversity loss

The Sampo Group companies should encourage their customers, investee companies, suppliers, and other business partners to uphold similar environmental and climate commitments. All engagement activities with external stakeholders must be aligned with Sampo Group's environmental principles and public commitments (e.g. UN Global Compact, Paris Agreement). The Group companies should also ensure that incident investigation and processes for corrective actions are in place for environmental and climate matters linked to their business.





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Whistleblowing

Sampo Group has whistleblowing channels where employees and relevant interest groups can anonymously report any cases in which they have reasonable grounds to suspect that somebody employed by Sampo Group has breached the Code of Conduct, legislation, regulations, or other rules that are relevant to the financial services industry. All whistleblowing reports are investigated promptly and in a confidential manner, while always protecting the identity of the whistleblower. Sampo Group ensures that the outcomes and remedies related to the whistleblower system accord with internationally recognised human rights and local legislation.

In addition to the whistleblowing channels, Sampo Group encourages its employees to report grievances related to unethical practices, as well as possible violations of laws, regulations, or internal policies through internal reporting channels.

Further information on available whistleblowing channels:

www.sampo.com

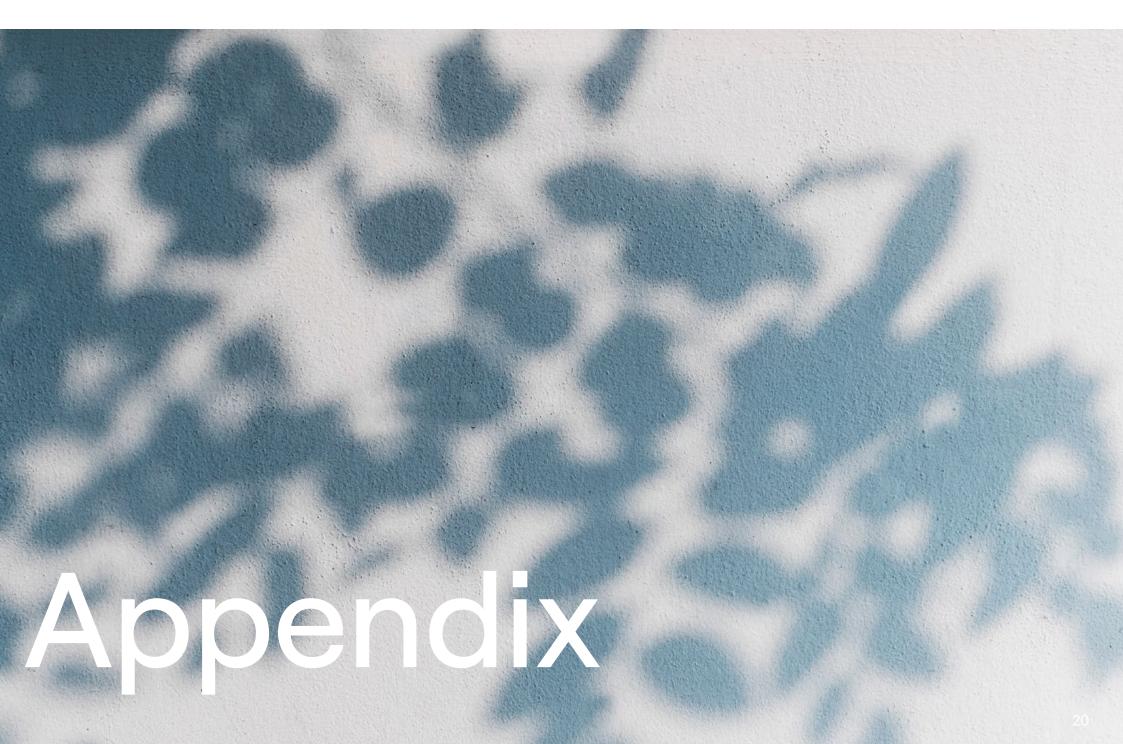
Non-retaliation policy

Sampo Group prohibits any form of retaliation (e.g. physical, psychological, economic) against an employee who in good faith raises a concern about suspected or actual misconduct through any reporting channel, or who cooperates in an investigation of misconduct.

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If you detect inappropriate business or personal conduct that represents a potential or actual violation of this Code of Conduct and its principles, you are encouraged to report it to a leader or through the whistleblowing channel.





Appendix: The Principles of the UN Global Compact





Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2 make sure that they are not complicit in human rights abuses.

Principle 3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4 the elimination of all forms of forced and compulsory labor;

Principle 5 the effective abolition of child labour; and

Principle 6 the elimination of discrimination in respect of employment and occupation.



Principle 7 Businesses should support a precautionary approach to environmental challenges;

Principle 8 undertake initiatives to promote greater environmental responsibility; and

Principle 9 encourage the development and diffusion of environmentally friendly technologies.



Principle 10 Businesses should work against corruption in all its forms, including extortion and bribery. Appendix



Further information:

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