VTT’S CODE OF CONDUCT
Dear colleague,

This Code of Conduct is first of its kind at VTT. We wanted explicitly make a statement of the importance of doing responsible and ethical business by formulating these commitments. Naturally their spirit has been an integral part of our everyday work also before and our previous Operating policy document contained many similar topics.

Our revised strategy emphasises VTT’s role as a growth partner through technology for its customers and society. Together with our customers and partners we solve challenging questions and develop innovations via applied technology research. It is essential that all our stakeholders can trust our compliance not only with laws and regulations but also with the highest ethical norms.

VTT’s Code of Conduct is a key component in our compliance programme. We all are committed to it. VTT has a well-earned reputation of being reliable partner. Culture builds on individual, every day actions and decisions. This covers the quality and reliability of the research results, the way we interact with our partners, paying special attention to occupational safety and environmental issues etc. Remember that if in doubt - ask first!

Every action counts.

**Antti Vasara**  
President & CEO

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**CORE VALUES**
- Together for the client
- One step ahead
- Passion for innovation
- Support and respect to the core

**ETHICAL STANDARDS**
- Impartiality
- Reliability
- Integrity
- Responsibility
VTT’S CODE OF CONDUCT

Business integrity

• We comply with all applicable laws and regulations
• We support fair competition and use conscientiously public funds
• We make sure that VTT’s interest is sought – not personal benefits
• We will not tolerate corruption of any kind
• We take care of VTT’s assets and customer information
• We apply high ethical standards in research

Working safely, professionally and respecting the environment

• We do not make compromises in safety
• We provide our personnel with equal and fair opportunities
• We respect the environment

Compliance builds on joint actions

• We all should do our part in compliance
We comply with all applicable laws and regulations

VTT is a state owned, not-for-profit limited liability company and we operate under the mandate of the Ministry of Employment and Economy. VTT’s operations are regulated by the Act on VTT Technical Research Centre of Finland Ltd.

Applicable laws and regulations set the minimum requirement for all of our operations. In addition to these there are voluntary commitments and standards which we comply with. We follow good business practices and require that also from our suppliers & service providers.

VTT informs on its operations and organisation in a transparent manner. VTT communicates its expertise and the impact of its technologies when it is deemed important, such as when the outcome of our research is scientifically significant or otherwise important in terms of the future.

VTT is compliant with the Finnish Corporate Governance Code for listed companies with certain deviations as explained in VTT’s Corporate Governance.

When procuring services, we comply with the applicable public procurement legislation and our internal procurement guidelines.


Obeying laws and regulations is a common responsibility for everyone in VTT. If in doubt consult your superior, Legal Function or Compliance Officer.

We support fair competition and use conscientiously public funds

In external and internal accounting and reporting, we make sure that commercial activities are separated from non-commercial activities in a transparent manner. No subvention or misuse of governmental grant of any kind is allowed. Pricing in contract research is based on market value.

When doing international business where trade control regulations may become applicable, VTT is committed to complying with such applicable international trade controls and also anti-terrorism, anti-bribery and anti-money laundering laws. Dual-use of technology is one of the main topics to take care of appropriately.

We arrange the financial management process in a controlled, cost-effective, optimal and effective manner with a view to serving the interests of the whole VTT Group. Issues related to cash flow, capital and risk management are taken into account in all economic decision-making. The management of VTT and its subsidiaries ensure that financially sound principles are followed in all operations and decisions.

REMEMBER
• Get familiar with pricing principles, finance experts and Key Account Managers will assist.
• Government grant is used in research activities either in jointly funded or self-funded projects.
• Pay attention to possible trade control regulations when making proposals to international customers.
We make sure that VTT’s interest is sought – not personal benefits

A conflict of interest arises when the private interests of a person conflict with the interests of VTT. We pay special attention to conflicts of interest and seek to ensure that the persons making decisions have no vested interest in the matters decided upon. VTT’s employees must make decisions in accordance with VTT’s best interests and not their personal interests.

We respect the freedom of speech and the freedom of expression of our employees. However, these may be limited by the employee’s obligations for loyalty and confidentiality. We encourage our employees to be visible in the public domain and take a stand on topical issues in the media by their own expertise. The specific guidelines describe how a VTT Group’s employee may work in the boards of VTT’s subsidiaries and affiliated companies without a threat of conflict of interests. In particular, we seek to ensure that the required impartiality principles are followed when assessing conformity.

Organizational autonomy has been ensured by separating tasks that require impartiality and independency. Autonomy in decision making has been ensured by internal instruction; Approval rights of VTT.

Operational autonomy has been ensured by defining tasks of persons participating in operations as well as qualifications and assessments.

Financial autonomy has been ensured by separating accounts of non-commercial activities from commercial activities within VTT Ltd by separating bookkeeping of VTT Group companies.

REMEmber

- Do not take an outside job which might interfere with your duties at VTT
- All statements should be based on objective research results within your area of expertise. Official statements – for instance replies to requests by officials, ministries, or other public administration’s requests for statement – are signed according to Approval rights in VTT-document.
We will not tolerate corruption of any kind

VTT does not accept any form of corruption or fraud. VTT’s personnel may not claim, approve or accept any financial compensation or other benefit that could affect their ability to perform their jobs objectively and impartially. Accepting bribes is prohibited under penalty. All types of corruption and bribery are prohibited and all the necessary measures are taken in order to prevent them.

Offering or receiving gifts and invitations are to be carefully considered. Their value should not exceed what can be considered as a reasonable hospitality. Also make sure that it is not done repeatedly with same persons or organisations.

REMEmBER

• Attempt to influence with wrong means is already considered as bribery - even without actual influencing takes place.
• Never offer cash or any equivalent of it.
• Gift or hospitality should be given and received openly showing that there is nothing to hide.
• If you encounter an attempt of bribery or other wrong mean of influencing, immediately inform your superior and Legal Function or Compliance Officer.
We take care of VTT’s assets and our customers’ information

We use and maintain all VTT’s assets – funds, properties, facilities, equipment, Intellectual Property Rights etc. – carefully and solely on business purposes.

The aim of our security measures is to ensure uninterrupted operations and protect our personnel, property, information, premises and the environment from accidents, damage and crime under all circumstances. We take into consideration national and international security policy programmes and other strategic objectives.

We pay special attention to data security, in which the aim is to protect the data from outsiders (confidentiality and secrecy), to prevent unauthorised changes in data (integrity), to guarantee the availability of the data and to ensure the uninterrupted operation of VTT’s IT systems in abnormal conditions. In its activities VTT follows the governmental guidance on information security.

The main security principles and responsibilities are described in the VTT’s safety and security processes. These include necessary guidelines for the personnel and the cooperation partners.

Our customers and partners are very important to us, and we always safeguard the confidentiality of information. We do not disclose confidential information of our customers to outsiders and we handle such information with care. We do not publish the results of our assignments, unless they are a matter of public record or the customer has given the consent to publish them. We respect any contractual and legal requirements on confidentiality as well as our applicable internal policies.

VTT values its Intellectual Property Rights and protects and develops its IPR efficiently in accordance with its internal policies. We seek to further develop our core technologies in order to be a leading world-class research institute. We offer patent rights and other IPR for purchase or licensing. Our technologies may also be used in the launch of new spin-offs or joint ventures. VTT’s IPR is commercialised at a market price.

REMEmBER

- Take cybersecurity issues seriously. Use secure means when transmitting confidential information.
- Don’t leave your mobile phone or laptop unattended. When travelling in high risk areas do not carry devices containing sensitive information with you at all.
- Customer confidentiality is the corner stone of our business – respect that always.
- Make promptly an invention disclosure when you have discovered a novel and inventive technical solution.
- Report immediately if there is a threat towards VTT’s assets or you notice e.g. malfunctioning or defects of any kind.

Protect VTT’s and customers’ assets
We apply high ethical standards in research

Our ethical norms are based on impartiality, reliability, integrity and accountability. The ethical norms stress the importance of following good practices and lay the foundation for sincere, reliable and confidential cooperation with customers and partners and among VTT’s personnel.

In our research operations, we follow the ethical research guidelines issued by the National Advisory Board on Research Ethics. Actions that are against good research practices, such as presentation of invented or falsified results or plagiarism, are unacceptable. Quoting from another work without citing the source is against good research practices.

**Animal testing** is not performed by the VTT. However, sometimes VTT participates in cooperation projects, where the project includes animal testing by other research cooperation parties. VTT actively develops alternative research methods and processes, in particular technologies based on in vitro cell cultures. If alternative methods cannot be used, VTT ensures that the party responsible for the animal testing follows the respective laws and other statutes on laboratory animals and that the animals are treated according to the said laws and statutes.

**Gene technology** research of VTT is based on research methods and processes, where safety and ethicality are ensured. VTT uses micro-organisms modified by gene technology and cultured plant and animal cells in closed laboratory environments and does not perform field testing.

**REMEMBER**

- Make sure that you include correct names as writers to a publication – no additional names e.g. based on position nor neglecting anyone with reasonable contribution.
- Always inform your superior if you suspect that ethical principles are violated in research and related activities.
We do not make compromises in safety

VTT requires a high level of safety in all its operations. As a result, our objectives regarding occupational safety are the following:

• The development and continuous improvement of occupational safety activities is part of our strategic planning.
• VTT has the target of zero accidents.
• Work at VTT is motivating and the individual’s functional ability, resources and development needs are taken into account (physical, psychological and social loading).
• It is safe and not damaging to health for people to work at VTT’s facilities.

Nuclear and radiation safety is always our top priority, and this policy is communicated to our personnel. We ensure sufficient financial and human resources for taking care of the safety, and support the competence development of the people responsible for the safety. We encourage the personnel to freely bring out all safety observations. We enhance our safety culture in a target-oriented systematic manner, taking into account the principles of continuous development.

VTT’s personnel has a duty to act according to the safety and security guidelines. The necessary safety and security processes are included in the contracts concluded with the cooperation partners. VTT’s or its cooperation partner’s personnel are obliged to inform their respective superior and VTT’s Security Manager or Information Security Manager on any lack, threat or fault in safety and security.

The contingency plan describes the procedures applicable in state of emergency.

REMEmBER

• Make sure that you are familiar with the safety and emergency procedures. If the work practices are new to you, ask guidance from colleagues, project manager or superiors.
• Act and report immediately when you notice something compromising work safety.
• Inform also our service providers and other partners about safety and emergency procedures inside VTT’s premises.

Safety first
We provide our personnel with equal and fair opportunities

We support universal human rights within our sphere of influence. We do not accept the use of child labour or any forms of forced labour.

Our aim is to ensure the competence, motivation and well-being of the personnel and a healthy work environment. We believe that every individual should be treated with respect and dignity. In our recruitment and employment, we comply with applicable employment and labour laws and regulations. VTT’s aim is that all open vacancies are published internally and/or externally. The selection is based on competence and education required as well as suitability to the job. The compensation is based on job requirements and performance in it.

We do not accept any discrimination against employees on the basis of age, gender, origin, sexual orientation, political activity or any other reason. We strive for equality between men and women at VTT and do not tolerate any form of harassment in the workplace. Our Equality Plan consists of targets, actions and measurements to promote equality.

We provide our personnel with equal and fair opportunities in work and support them in balancing work and private life.

Our aim is that we all appreciate each others’ involvement in the work community so that everyone’s creativity and expertise is appreciated. Participation systems and the way in which work is organised make it possible for the personnel to influence their work. Expertise is developed with a view to fostering international standards of expertise, scientific competence and customers’ success. The expectations placed on the personnel are realistic and challenging. VTT’s target is to have a capacity of personnel expertise and competence in efficient use.

To confirm fair and equal treatment, wife, husband, partners, siblings, parent-child or grandparent-grandchild cannot be in a supervisor-subordinate relation. In such cases supervisor-subordinate relation will be dismantled by job rotation or other appropriate manner.

VTT respects all applicable privacy laws and regulations. When collecting and processing personal data, we do so with care and diligence and by respecting our commitments with our clients. We only collect, use, and store personal data which is necessary for our operations.

REMEmber

• Respect and support your colleagues.
• If you notice any harassment don’t just walk away. There are several ways to take the issue forward.

You build the spirit in VTT!
We respect the environment

Most important positive environmental impact is to be obtained through our research activities as indirect effects. We develop innovative solutions, products and processes that support industrial competitiveness and social well-being, promote the effective use of raw materials and energy, and prevent harmful environmental impacts.

Other key environmental principles include improving the eco-efficiency of our operations, communicating our environmental issues openly, and producing expert information to support decision-making by companies and society.

In procurement we favour products with lower impact on environment when feasible.

We report on corporate responsibility applying the Global Reporting Initiative guidelines partly. VTT has been ISO14001-certified since 2014.

REMEMBER

• When planning a project, consider the environmental effects of the anticipated outcome.
• Be careful in experimental work not to create unnecessary burden to environment. Use risk analysis to evaluate the critical topics.
• Use teleconferencing instead of travelling when feasible.
We all should do our part in compliance

This Code of Conduct is a key component in our compliance programme. We require that our employees familiarise themselves with this Code and commit to complying with its instructions. Any possible violations of this Code are be reported to the line manager of the person in question, to Legal Function or to Compliance Officer.

Internal audit and Compliance Function are both independent and report to VTT Board’s Audit Committee. They give recommendations, decisions are made by the line management.

**Ethics Committee** deals with questions and observations of good scientific practice. Each Business Area has also a supporting expert who is especially familiar with research ethics.

Suspicions about abuses and actions in breach of VTT’s guidelines can be reported to VTT’s Compliance Officer, Internal Auditor, Ethics Committee and to the Audit Committee of VTT’s Board of Directors, in two ways:

- By sending an email message to VTT’s Compliance Officer compliance.officer@vtt.fi (both external and internal users)
- By completing the form in VTT’s Intranet (for internal users only). Your message will be sent to VTT’s Compliance Officer and Internal Auditor, for information. The message will be forwarded to VTT’s ethical committee in suspicions concerning good scientific practice.

Compliance Committee arranges a meeting to handle the cases. The Committee consists of Compliance Officer, Internal Auditor, Senior Vice President, General Counsel and Senior Vice President, Human Resources.

All suspected cases that are reported will be investigated in the appropriate manner, regardless of the issue. Reporting abuses will lead to no negative consequences for the whistleblower. Suspected abuses will be investigated in confidence; only those parties who are absolutely necessary to investigating the matter and taking the related measures will be informed.

After the completion of the investigation, VTT’s management will decide on the possible consequences of abuses, or repercussions for those found guilty of non-compliance with its guidelines. A regular summary of any reports, their investigation and the measures decided on will be drawn up for the Audit Committee of VTT Board.

VTT recommends that whistleblowers report in their own name, in order to promote the accuracy, efficiency and fairness of the related investigation. However, suspicions related to good scientific practice should always be reported in your own name. Report and explain the issue in sufficient detail, in order to facilitate the investigation. VTT does not accept the abuse of the above-mentioned channels.

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**REMEMBER**

- Learn the Code and act accordingly.
- Report on suspicions e.g. by using the whistleblowing channel.
- If in doubt consult your superior, Legal Function or Compliance Officer.

"Do what is right!"
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