

Granlund Group's Anti-Corruption and Anti-Bribery Policy

The purpose of this policy is to ensure compliance with all applicable anti-corruption and anti-bribery regulations and to ensure that the Granlund Group conducts its business in an ethically and socially responsible manner.

The Granlund Group has zero tolerance for bribery and corruption. We are committed to acting professionally, fairly and honestly in all our business transactions and relationships wherever we operate. We comply with all anti-bribery and anti-corruption laws in all jurisdictions in which we operate. This policy applies to all employees, consultants, contractors, or other individuals associated with us, regardless of where they are located.

Definitions

- **Bribery:** Bribery is the act of offering, promising, giving, accepting, or requesting a benefit, either directly or indirectly, as an incentive to engage in illegal activity or breach of trust. Incentives may include, but are not limited to, money, gifts, loans, commissions or other benefits to any person in connection with business to acquire or maintain business or to obtain or preserve personal or other improper gain.
- **Corruption:** Corruption refers to the abuse of entrusted power for private gain. Bribery, fraud, embezzlement and extortion are examples of forms of corruption.

Prohibition of bribery and corruption

Employees must not participate in any form of bribery or corruption, either directly or through third parties. For the sake of clarity, facilitation payments and rewards are prohibited as forms of bribery. Facilitation fees are informal payments that are made to secure or speed up regulatory routines, such as permit applications. Rewards are a form of bribery between private parties with the aim of winning a contract.

Neutrality

We are an impartial expert on our clients and have no conflicting contacts with industry, contractor companies or similar parties that could jeopardise our impartiality. We cooperate well with other stakeholders, but our business is guided by our expertise and the needs of our customers. We have a duty to report on our commitments to other companies. We do not accept side jobs that could harm our work, and we always discuss and agree with senior management on side jobs outside the company.

Gifts and hospitality

We do not offer or accept gifts or hospitality that could be considered to influence business decisions. This includes not giving or accepting excessively large gifts, such as goods, food, drink, travel, or other benefits. We actively participate in seminars, fact-finding trips and other events in the field, but we primarily pay for accommodation, travel and seminar costs ourselves. We only accept low-value and open invitations that are part of normal marketing and do not create a conflict of interest. With regard to gifts and hospitality, we use special consideration when there is an open tender or other cooperation or contract negotiation with the party in question.

Sponsorships and donations

The Granlund Group's mission is to produce well-being for people, buildings and the environment. Our mission and values guide what kind of causes we support and what kind of donations we give. Our long-term goal is to bring about positive societal change in the real estate and construction industry, both through our own innovation work and by developing the industry.

We do not seek to influence public decisions or decision-makers. We do not sponsor religiously or politically committed causes.

Donations must be transparent and approved by business unit managers so that they are not used as a disguise for bribery.

Reporting mechanisms and enforcement

Employees and other stakeholders are encouraged to report any suspected bribery or corruption through [our Whistleblowing channel](#). Whistleblower protection is in place to ensure that those who report unethical behaviour are not targeted for retaliation.

Violation of this policy will result in disciplinary action, which may include termination of employment and legal consequences.

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Pekka Metsi

CEO

Granlund Group