

greenstep

Code of Conduct



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Dear Greenstepers,

Our mission has always been to help organisations grow. Through our high-quality services, we give them the support they need to reach their full potential. But beyond that, we are committed to creating a more sustainable business environment for the future.

Everything we do is guided by our strong values, teamwork, and a shared commitment to delivering the best service to our customers. We aim to do as much good as possible – supporting our clients, colleagues, and the wider community in meaningful ways.

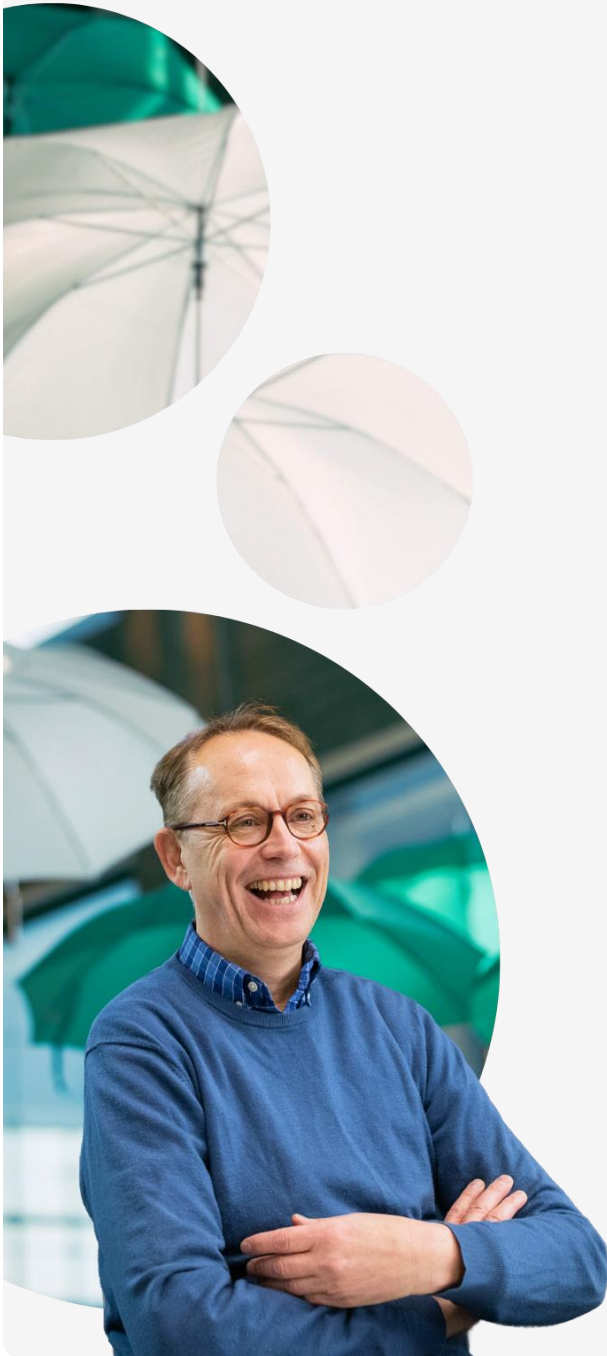
This Code of Conduct is more than just a set of guidelines – it's a reflection of who we are and how we treat each other. By following these principles, we ensure trust, respect and professionalism in the way we work and communicate.

Let's embrace these guidelines and continue to build a company we can all be proud of.

Together, we make a difference!

Sincerely,

Tore Teir



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Introduction to the Code of Conduct

Greenstep's Code of Conduct is an important document that outlines the ethical principles guiding our behavior as a company and as individuals. It serves as a guide for making decisions and taking actions that are essential to our operations. The Code explains how we should manage our relationships with clients, business partners, employees, and the wider community and network. This Code of Conduct applies to everyone at Greenstep Group.

This Code is not meant to replace or ignore any laws or regulations. If there is ever a conflict between the Code and the law, the law always takes precedence. It's important to know that this Code does not give permission to break the law.

By following the Code of Conduct, we show our commitment to doing the right thing and being responsible in our business practices. The Code reflects our values and principles, and we take it seriously. If you have any questions or concerns about the Code of Conduct, please feel free to reach out to your team lead or the relevant department for help.



Our History And Culture



Greenstep was founded in 2010 in Helsinki, Finland, as a family business with people at its heart. We are a growing, global group helping thousands of companies in Europe to grow through clarity. **Green** signifies the growth that we achieve by taking the necessary **steps** together.

We are known in the market both for our **first-class services** and as a **reliable and stable employer**. Our client base of over 2,000 clients includes companies and organisations from a wide range of industries – from start-ups to large listed companies and public sector organisations.



Over the years, our team has expanded to include hundreds of top-notch professionals. They are here to support our customers with quality services in **Financial Management, Payroll, HR, CFO, ERP, Analytics, Legal, Tax, Sustainability, L&D, AI and Automation**.

We act as consultants to the market leaders in financial management systems, in addition to continuously developing our own software. Systems developed by Greenstep include **Bezala, BI Book and Finance.Rocks**.



Nowadays we operate in Finland, Sweden, Norway, Estonia,, the Netherlands and the UK and other 100+ countries through the international MSI network. Our main office is located in Espoo, Finland.

Even as we grow, we remain dedicated to our core values of sustainability, innovation and an enthusiastic attitude towards doing, achieving and delighting our customers.

Values and Commitments



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Our Core Values

At Greenstep, our core values guide how we interact with clients, partners, and each other. These values include:



Desire to delight
our customers



Will to develop
ourselves and
our knowledge



Passion for achieving
together



Honesty and
appreciation
towards each other

Commitment to Quality

We are dedicated to delivering high-quality services. Our operations follow several Quality Standards and Protocols, which help us maintain efficiency, reliability, and security in everything we do. Those requirements apply to all at Greenstep.

By integrating these quality requirements into our daily work, we create a strong foundation for both operational excellence and confidentiality. These elements are at the core of our commitment to our clients. Our team is trained to stick to these principles in every job, promoting ongoing improvement, a focus on customers, and security.



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Commitment to Sustainability

At Greenstep, sustainability is at the heart of our operations. We aim to make a real and lasting difference in our communities, economy, and environment. Everyone on our team, from leaders to every employee, plays a part in this mission.

We want to make a positive difference by supporting local businesses, embracing diversity and inclusion, and giving back to our communities. Our goal is to create lasting value for everyone involved by making sustainable choices that benefit all.

We focus on:

- **Sustainable finance and governance** to ensure our financial decisions support long-term well-being.
- **A fair and healthy workplace** where everyone feels valued and supported. Additionally, we invest in high-quality development opportunities for our team members, helping them grow and thrive.
- **Environmentally sustainable choices** that we hope will contribute to a healthier planet for future generations.

We recognize the environmental impact of our activities and understand that the products and services we provide can affect the environment and climate. Greenstep operates according to **legal requirements and the United Nations Guiding Principles on Business and Human Rights (UNGPs)**. We encourage all our employees, customers, and partners to consider sustainability factors in their decisions.



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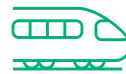
The Environment

As an employee, you are expected to:



Do Your Part

Help reduce emissions, combat climate change, and be energy efficient. Think about how to save natural resources at the office, at home, and while traveling.



Rethink Travel

Opt for virtual meetings when possible and choose low-impact travel options when trips are essential.



Engage with Partners

When possible, ask about a partner's environmental practices and consider these factors when making decisions about new partners.



Contribute Ideas

Share sustainability ideas or identify areas for more environmentally friendly practices within the company.

Compliance



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Complying with Laws, Regulations, and Standards

At Greenstep, doing what's best for our ecosystem means not only doing what's ethically and morally right but also adhering to legal requirements, whether local, national, or international.

As a service provider, we must adhere to specific business regulations, of which examples are:

- **Protection of Personally identifiable data ("GDPR")**
- **Anti-money laundering regulations / Know your customer ("KYC")**
- **Insider trading regulation**
- **Information security ("NIS2")**
- **General Operational Guidelines for the Financial Management Sector**

We actively keep up with legal developments and we expect high ethical standards from our personnel and business partners. Legal compliance sets the minimum standard for our operations, but our commitment goes further. We strive not only to meet legal requirements but to uphold the highest ethical standards and establish best practices in every aspect of our work.

We have developed policies and standard procedures to ensure that we maintain the highest standards of responsible conduct and corporate governance throughout the organization. To help guide us, we have clear internal policies and procedures. If legal requirements and our Code of Conduct differ, we follow the stricter standard to make sure we uphold both the law and our values.



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As an employee, you are expected to:



Understand The Basics and Stay Curious

Take time to read and understand key regulations relevant to our organization and to your role. Take part in training sessions and learning opportunities to deepen your understanding.



Be a Role Model

Promote ethical behavior and compliance with mandatory requirements by holding yourself and others accountable to legal and policy standards.



Ask Questions

Consult your Team Lead or other relevant personnel at Greenstep whenever you are unsure about any legal issues or developments.



Speak Up Early

If you spot a potential compliance issue, report it immediately so it can be addressed properly. This is especially important in our services under Know Your Customer (KYC) regulations, as we have an obligation to report to authorities if we notice any signs of money laundering.

Preventing Fraud and Corruption

At Greenstep, **we take a strong stand against bribery and corruption, including money laundering, collusion, extortion, fraud, and facilitation payments.** Offering or receiving anything of value to improperly influence a decision, as well as the misuse of power for personal gain, are strictly prohibited.

We comply with all applicable anti-corruption regulation and standards and expect the same from our partners. We avoid any actions that could be seen as trying to improperly influence decisions, understanding that questionable payments made by us or anyone acting on our behalf could lead to serious legal consequences for both individuals and the company.

- We are mindful about the gifts we give and receive, only exchanging items of low value financial and providing reasonable hospitality to our partners.
- Personal gifts must be suitable for the occasion and should not exceed a reasonable value.
- Business dinners are fine, as long as they are not over-the-top.
- Both gifts and hospitality should be occasional and not something we do regularly, and they should never suggest that we expect something in return.
- In situations where giving a gift could be perceived as an attempt to influence a decision, it is best to refrain from offering one.
- We also recognize that some of our clients, partners, or local authorities may have stricter rules about gifts and hospitality, which means our company must always respect and comply with those requirements even if they are more restrictive than our own guidelines.



As an employee, you are expected to:



Avoid Improper Benefits

Do not offer or accept money or other benefits to obtain or retain business or instruct anyone else to do so on your own or the company's behalf.



Contractual Payments

Do not make payments to business partners that are not specified in the contract.



Facilitation Payments

Do not offer payments or favors to facilitate decisions made by government officials or others. Be particularly vigilant when doing business in areas known for high corruption risks.



Gift Policies

Do not give any gifts in exchange for any other benefit. Only give and accept occasional non-cash gifts or hospitality that is appropriate. Do not give any gifts to potential business partners during negotiations. Politely decline any gifts that exceed our policy and explain that it is based on company rules.



Travel Costs

If you are participating in an event abroad, your employer should cover all significant costs, such as flights, accommodation, and event fees. At the same time, do not offer to pay these travel costs for our business partners.



Seek Guidance

If refusing a gift might offend your host or if you are unsure about any issues related to giving and accepting gifts, please contact your Team Lead.

Information Security

We prioritize the confidentiality of information regarding Greenstep, our clients and other third parties, particularly in safeguarding sensitive business information. Violating confidentiality can lead to significant costs and damage to our reputation.

At Greenstep, we handle all our own and customer data with care, collecting only what we need for our services and processing it in a lawful manner. Employees should only access confidential data when absolutely necessary for their work and must keep any accessed information private.

We are proud to have achieved **ISO 27001 certification**, which demonstrates our commitment to protecting data and managing information security risks. This means that your information is safeguarded to the highest standards. However, please note that in certain cases, public authorities may have a legal right to request and access specific information.



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As an employee, you are expected to:



Stay Vigilant

Always be careful when opening emails, links, or attachments. Stay alert and check your surroundings when working with sensitive materials.



Limit Data Requests

Only ask for or provide data when there's a legitimate need to know. Use data only for its intended purpose and never for personal gain or unauthorized activities.



Practice Data Minimization

Collect and keep only the data you truly need. Retain data only for as long as necessary.



Store Data Securely

Save files only in the archiving tools and folders approved by Greenstep. Avoid leaving confidential materials in open areas. Always dispose of unnecessary confidential data properly, whether it's physical or digital.





Protect Confidential Information

Never send or forward emails, images, or documents containing confidential information to personal (non-firm) email accounts or to any unauthorized user or application, whether inside or outside our firm.



Encourage Data Security Awareness

Share knowledge about information security with your colleagues to promote a culture of awareness and responsibility.



Keep Information Safe

Make sure any critical business information is stored and shared securely.



Stay Updated on Data Laws

Be aware of relevant data laws and regulations when transferring personal data across borders. For more information, check out Greenstep's Information Security Policy and our privacy statements.



Report Security Incidents

If you suspect any data breaches or security incidents, report them immediately to Greenstep's Security team (security@greenstep.com). Quick action can minimize damage!



Participate in Security Training

Participate in any training sessions on information security to enhance your understanding and skills in protecting sensitive information.

Data Privacy (GDPR)

We are committed to protecting both Greenstep's employees' personal data and our clients' employees' data. We have set up global information security and privacy programs, controls, and standards for how we collect, use, store, transfer, and secure business sensitive data as well as personal data. We comply with all applicable data protection laws and only keep personal data for as long as we need it and only for that specific purpose.

We are always looking for ways to improve our technologies, processes, and controls to prevent, detect, and respond to internal and external information security and data privacy threats. We also help our clients protect their data with our expertise.



Intellectual property rights (IPR)

We respect and protect our firm's intellectual property (IP). We limit the use and sharing of our IP as needed and honor the IP rights of others. Examples of IP include tangible materials like assets, solutions, software, images, publications, and videos, as well as intangible materials like algorithms, know-how, frameworks, and methodologies, all protected by trade secrets, patents, trademarks, and copyrights.

We are dedicated to respecting the intellectual property rights of others. In practice, this commitment entails familiarity with IPRs. Additionally, it requires awareness of usage rules, ensuring that we are knowledgeable about the regulations and limitations that govern the use of IPRs to maintain compliance and avoid infringement. By adhering to these practices, we foster a culture of respect and integrity in all our endeavors, promoting innovation while safeguarding the rights of others.

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As an employee, you are expected to:



Stay Informed About GDPR

Keep yourself updated on regulations regarding handling of personal data and how they impact your work. Understanding these laws helps protect both your own personal data and the personal data related to our clients.



Handle Data with Care

Only collect, store, access, or use personal data when it's essential for your job. Always ensure it serves a legitimate business purpose.



Keep Information Private

Don't share personal data with those who don't need it within the organization, and never disclose it to unauthorized individuals outside the organization.



Participate in GDPR Training

Engage in our training sessions on GDPR to enhance your understanding and skills in protecting sensitive information.

Business Ethics and Our Interactions with Stakeholders



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Selection of Clients and Third Parties

We carefully select our clients and engagements. Our Know Your Customer process and policy guide our decision-making process when choosing clients and engagements. Additionally, our KYC policy outlines clear guidelines on services and work that we will not undertake.

All employees are accountable for adhering to our **KYC policy and process**. We have a dedicated KYC team, who oversees the client and engagement selection process.

We collaborate with a diverse range of suppliers, subcontractors, and other stakeholders of various sizes and capabilities. We treat all our suppliers as partners, engaging with them respectfully, openly, and honestly, and we expect the same in return.

We are committed to improving responsible supply chain management and traceability. As a service provider, we are dedicated to safeguarding the health, safety, and well-being of those who use our services and interact with our business.

Consequently:

- We require high social, environmental, and human rights standards from our partners.
- We expect our partners to conduct appropriate due diligence in their sourcing practices to ensure compliance with applicable legislation.

These aspects have been summarized in our Vendor guidelines and Vendor assessment routines.



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As an employee, you are expected to:



Seek Advice

If you're dealing with complex or high-risk clients and engagements, don't hesitate to reach out to our Compliance or KYC team.



Conduct Thorough Assessments

Perform comprehensive "KYC" (Know Your Customer) assessments for all client opportunities to ensure we're making informed choices.



Get Familiar With Relevant Laws

Understand the legal framework that applies to our work or our clients, such as those related to accounting practices, taxational matters and Companies' Act.



Follow Vendor Guidelines

Perform and document vendor assessment when considering a new supplier, subcontractor, system provider or business partner. Depending on the nature of collaboration the assessment can include for example review of practices, contract or technological aspects.

Conflicts of Interest



We recognize the importance of disclosing any situation that might lead to a potential conflict of interest. Conflicts can arise when personal interests clash with those of the company or when an employee's loyalties differ from those of the organization.

Our goal is to avoid competing interests and to make decisions that prioritize the best interests of the company. Personal interests and relationships should never sway our decision-making. A potential conflict of interest only becomes problematic if it is not properly disclosed and managed.

Therefore, it is key to maintain openness and transparency in all situations where an employee or stakeholder might be tempted to act in their own interest rather than that of the company.

As an employee, you are expected to:



Acquire Permission

Request a secondary activity permit from the People Team for any work or voluntary activities that may impact your responsibilities at Greenstep.



Keep Relationships Transparent

Keep your Team Lead informed of any connections with companies or individuals that could affect Greenstep or our partners.

Promote open dialogue about potential conflicts. Avoid letting personal relationships influence work decisions and ensure decisions involving close contacts are fair and performance-based.



Consult When Needed

If you are involved in selecting supply partners, choosing charitable causes, or making decisions regarding companies or organizations where you, a family member, or a close friend hold a position of responsibility or have a financial interest, seek advice from your Team Lead.



Follow Insider Trading Rules

If you work with a listed company as part of a service team, insider trading rules apply to you.

You must report any ownership interests in the company and are not allowed to use non-public information for trading. These restrictions also cover any confidential information you might receive while working.

Fair Competition

We advocate for free markets and fair competition, and we do not engage in any activities that could undermine either. We firmly believe that fair competition benefits our company, our customers, our partners, and society as a whole.

Compliance with competition law is a priority, as the regulation prohibits anti-competitive agreements, abuse of market power, and anti-competitive mergers and acquisitions. Violating this regulation not only harms our reputation but can also lead to serious consequences.

We will never discuss sensitive business information with competitors or enter into agreements regarding market share, pricing, production limitations, or any other factors that could restrict fair competition.



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As an employee, you are expected to:



Educate Yourself

Familiarize yourself with competition legislation in your country to understand your responsibilities and obligations.



Avoid Sensitive Discussions

Do not engage in conversations about pricing, customers, market share, or other sensitive business information with competitors. Keep discussions professional and focused.



Steer Clear of Agreements

Avoid entering into any agreements with known competitors that could be perceived as restricting free market competition.



Notify Your Team Lead & Seek Guidance

If another party suggests any of the above, inform your Team Lead immediately. If you are uncertain about these commitments and how to proceed, consult your Team Lead or refer to the contacts section provided at the end of this document.

Healthy Work Community



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Respectful Workplace & Discrimination and Harassment

Our commitment is to treat everyone with dignity and respect, regardless of race, religion, gender, political beliefs, age, nationality, sexual orientation, civil status, disability, or any other characteristic. Discrimination and hostile behavior in any form are unacceptable. We strive to create an environment where individuals feel safe to express themselves and can work free from harassment or bullying, whether physical, emotional, or sexual.

We also understand that accessibility is about people, and we're dedicated to providing an open, accessible, and inclusive environment for everyone. We aim to take proactive measures to ensure equal chances to participate.

All employees are evaluated based on their skills, ensuring equal opportunities for hiring and career advancement. We are dedicated to providing equal pay for equal work. We may also take positive actions to support groups that are currently underrepresented or disadvantaged.

Recognizing the importance of diversity, equity, and inclusion, we provide trainings and support in this area. We also expect our partners to uphold these values and treat everyone with respect.



As an employee, you are expected to:



Maintain Respect

Create a welcoming workplace where everyone feels comfortable and respected. Be kind, and avoid offensive jokes, intrusive questions, unwelcome physical contact, or comments that could make others feel uncomfortable.



Address Inappropriate Behavior

If someone's words make you uncomfortable, address the issue directly and privately, approaching the matter with respect.



Support and Include Your Coworkers

Offer support to colleagues when needed and ensure everyone is included in team discussions and activities. Value each person's contribution and help them feel heard and involved.



Value Differences

Appreciate and respect the diverse backgrounds, perspectives, and experiences of your coworkers. Listen actively, avoid making assumptions, and celebrate what makes each team member unique.



Report Discrimination

If you experience or witness unfair treatment or discrimination by a colleague, leader, customer, or partner, you can report it anonymously through our Whistleblowing channel. Please find more information about the channel in section 6 Reporting and Enforcement of this document.

Human Rights

Greenstep respects all internationally recognized human rights, including those outlined in the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. Our commitment extends to the United Nations Principles on Business and Human Rights.

We are responsible for ensuring that we do not infringe upon human rights we act proactively to uphold and respect these rights, addressing any potential violations. This commitment also applies to human rights within our supply chain and through the end use of our products or services.

We adhere to labor laws and agreements and do not tolerate threats, harassment, or retaliation against employees advocating for better working conditions. We support freedom of association and collective bargaining, recognizing their role in fair and constructive workplace relations. Forced labor, modern slavery, and child labor are strictly prohibited.

Employment must always be voluntary, free from coercion, and without restrictions on movement. Through regular human rights due diligence, we work to identify, prevent, and address potential risks, reinforcing our commitment to ethical and fair working conditions across all areas of our business.



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As an employee, you are expected to:



Ensure Compliance

Leaders must ensure that working conditions meet national and local laws and foster an open and safe environment where employees feel comfortable raising concerns.



Respect Rights

Uphold employees' rights to organize and engage in collective bargaining without fear of negative repercussions.



Partner Expectations

Ensure that our partners respect human rights and consider social factors when selecting partners.



Consult People team

Reach out to People team with any questions regarding your employment conditions.

Health, Safety, and Well-being

Our employees are our greatest asset, crucial for the success and growth of our company. It is our responsibility to ensure a safe and supportive work environment that promotes both physical and mental well-being. We are committed to helping our employees develop their skills and achieve their career goals.

To maintain a healthy work-life balance:

- We implement practices that ensure a safe workplace and comply with health regulations.
- We encourage everyone to actively identify and eliminate potential hazards and to prioritize their health, both at work and during their commutes.
- We expect good judgment during company events.
- The use of illegal substances or being under the influence of drugs or alcohol while at work is strictly prohibited.



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As an employee, you are expected to:



Keep a Good Work Ergonomics

Prevent work-related injuries, such as those related to ergonomics. This includes maintaining proper posture, taking regular breaks, and optimizing your workspace to promote comfort and safety, minimizing the risk of strain or injury.



Prioritize Your Health

Actively take care of your well-being and engage in activities that support a balanced and healthy lifestyle.



Participate in Wellness Programs

Take part in company initiatives that promote well-being, such as our wellbeing challenges or stress management workshops.



Practice Good Judgment

Make smart choices regarding your health and behavior, especially during company events.

Open and Honest Communication



Employees at Greenstep are encouraged to speak positively about the company while acting responsibly and respectfully at all times. Confidential or harmful information about Greenstep's operations and projects must not be disclosed.

As a Greenstep employee, you should communicate thoughtfully and avoid actions that could harm Greenstep, our business partners, or clients. Honesty, respect for others, and contributing to a constructive dialogue are essential.

Greenstep's computers, email addresses, and telephones should be used in a manner that does not negatively impact Greenstep and its brand due to personal activities of a controversial or unethical nature.

As an employee, you are expected to:



Communicate Clearly

Use the appropriate channels for sharing information and encourage open dialogue among team members.



Act Responsibly & Be Truthful

Be mindful of how your words and actions may impact others and the company. Communicate truthfully about our activities, and we expect the same from our partners.



Engaging with the Media

Feel free to share your experiences and insights on platforms like LinkedIn, as long as your posts are respectful and truthful. However, always consult with management before making official statements or engaging with the media on behalf of the company.



Share Experiences

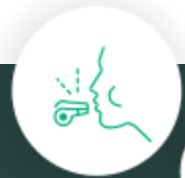
Everyone is encouraged to share their experiences, opinions, and suggestions for improvement.

Reporting and Enforcement

We are on
a mission to back
our clients up with
clarity, so that
they can build the
businesses of
the future.

Reporting Violations of the Code of Conduct

If you're a Greenstep's employee and see something that doesn't follow our Code of Conduct, you can talk to your Team Lead, or the Team Lead of the person involved. They're here to help with any concerns about misconduct. If you'd prefer not to speak to a Team Lead, you can reach out to someone in People or Compliance team.



Feeling Uncomfortable?

If you're not comfortable discussing your concerns with a Team Lead or the dedicated teams, you can use **our whistleblowing tool**. This tool lets you report issues or share concerns confidentially. You can choose to remain anonymous while still being able to communicate about your report. All reports are handled carefully and securely, and you can decide whether to share your contact information or stay anonymous.

All reports are investigated confidentially and in accordance with specified procedures. Possible resulting steps are taken only after the investigation has been concluded. The information from the report or the investigation can only be accessed by the people who need it to complete the investigation.

You create an incident from here: <https://app.easywhistle.com/report/greenstep/about>.

You do not need to have firm evidence of misconduct; however, reports should be submitted honestly and in good faith. Deliberate reporting of false information is strictly forbidden.

If you're a Greenstep partner, customer, or outside stakeholder and have concerns about our employees or leadership, they can also use the whistleblowing tool or contact our Human Resources.

Whistleblowing Protection

We take your concerns seriously and have a strict zero-tolerance policy against retaliation. This means **no one will face negative consequences for reporting issues or helping with investigations**. We will keep your report confidential, and you won't be punished for speaking up in good faith, even if the claim isn't proven true.

Enforcement of the Code of Conduct



Violating the Code can damage Greenstep's reputation, so we enforce it strictly. If an individual is found to have breached the Code, the person may be subject to disciplinary action, termination, or legal consequences.



If there's a suspicion of wrongdoing, all employees are expected to cooperate fully with any internal investigations. Leaders should support these investigations and help put in place any necessary changes to prevent future issues.