



Code of Conduct

Fail-Safe IT Solutions Oy

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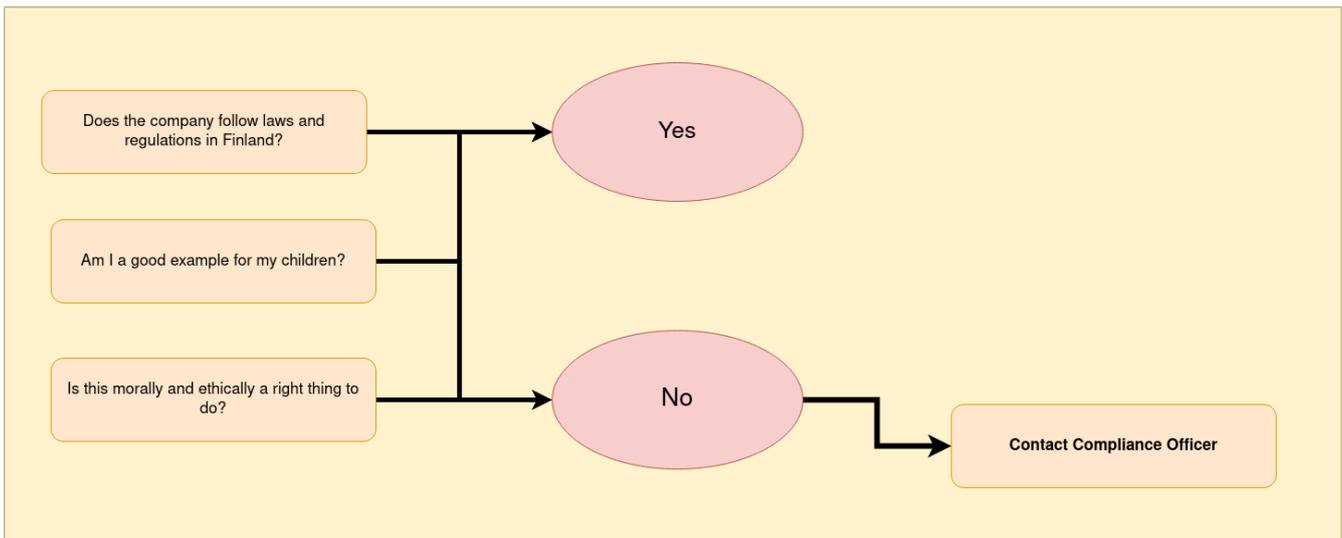


Figure 1: Ethical Process

Values

Fail-Safe IT Solutions is focused on creating value in the technology and information technology industry. The value is created by respecting all potential stakeholders of the company.

The core principles of the company are aligned with open source software movement:

- Contributions to open source software can be edited.
- Sharing the discovery or improper use of open source software as the company discovers it.

Ethical Guide for Managers, Officers and Board Members

- Supervisors or people in a similar position treat employees and other supervisors with respect.
- Misbehavior of leaders of any position in Fail-Safe will be addressed and handled.
- Favoritism systems are not allowed.
- Feedback at work, during work time or similar, must be delivered in a professional and precise manner.
- Employee's concerns must be listened.
- Employees are committed to treat company and partner members with respect.
- Violence and threatening acts are strictly disallowed.
- All violent threats and dangerous situations must be reported to the local police and directly to the Chief Executive Officer.

- Holding guns and detonating items are not allowed in physical company meetings. Guns must be concealed for remote meetings.

Ethical Guide for all Employees

- Employees are committed to document their work to ensure ethical quality of their labor.
- Employees are committed to upkeep their expertise to benefit customers.
- Employees are committed to report internal and external ethical issues.
- Employees are committed to treat company and partner members with respect.
- Violence and threatening acts are strictly disallowed.
- Holding guns and detonating items are not allowed in physical company meetings. Guns must be concealed for remote meetings.
- All violent threats and dangerous situations must be reported to the local police and directly to the Chief Executive Officer.

Ethical Issues, Whistle-Blowing

In case some part in decision diagram of ethical is not fulfilled, it is employee obligation to report it to the compliance officer.

Company Procedure, Process, Policies, Whistle-Blowing

Employees and partners are committed to follow company's processes.

Employees, who spot failures with company's practices, must report to the supervisor. If the situation is not addressed or can not be addressed by the supervisor, report to the compliance officer.

Partners and consultants must contact managers or executives in all matters where found breaking either code of conduct or other company's policies.

Whistle-Blowing and Exposing Malpractices

All reports to managers, executives or the compliance officer are confidential.

There will not be punishments even if the alarm or suspicion is false. However, systematic and intended campaigns against an employee or a consultant with false information will be punished. After whistle-blowing if the person becomes aware that they have been misled and announces this information, the person will not be punished.

Malpractice and Punishments

If persons are found breaking the company's policy, processes, procedures, code of conduct or regulation, they will face consequences. The severity of adversity will be considered when dealing with consequences.

Employees will receive a written warning if the misdemeanor is mild and non-critical to the company.

Cases of bullying and harassment are dealt with seriousness if done by an employee or an executive. Cases of bullying will require hearing multiple employees and best way to start process is announcing it to supervisor.

Cases of bullying and harassment from consultants will influence to their contract or continuity of contract.

Violent crimes or the organized crime will be forwarded to the local police, Finnish Security and Intelligence Service, or other relevant regulators. These type of crimes are never dealt internally.

Harassment, Favoritism or Bullying

If you are facing a harassment or bullying, contact first your supervisor. If contacting the supervisor is not possible or otherwise seen unfair, report the case to the compliance officer.

Cases of discrimination or bullying based on clothing, ethnicity or belief must be reported to the human resources or the compliance officer.

If employees discover favoritism as

- an unfair work privileges,
- a lack of control on working hours,
- an unnecessary breaks,
- an unfair dealing of confidential information,
- or other similar behavior that clearly puts an employee to a different position without acceptable reason,

cases should be reported to human resources and to the compliance officer. This way unequal employees' treating practiced by supervisors, executives or board members will be avoided.

Please notice that salaries might not be a sufficient basis for an unequal treatment since employees have different experience levels. However, unfair favoritism is a form of bullying and will be dealt as such.

Intoxication, Addiction, Drugs at Work and Similar Situations

Substance abuse that affects to work will not be tolerated. Supervisors will follow the health procedure for Intoxication, addiction and similar situations when an employee is intoxicated during working hours. Fail-Safe and its employees are committed to maintain safe environment for colleagues, partners and customers.

Mental health topics are encouraged to be handled by appropriate healthcare personnel to give the best possible support for employees and contractors.

Employees and board members are strictly disallowed to carry and use illegal substances in the company's vehicle or on the company business.

Customers and Interaction with the Public

Fail-Safe acknowledges its part in the information technology ecosystem. The company aims to respect the open source community and to contribute to it well.

We bring the greatest care when acting with the customer or with the public.

Human Resource Practices

Fail-Safe aims for

- fairness in its human resource practices,
- relaxed procedure for potential employees.

To achieve these the company will

- choose employees with the best skills and motivation to the information technology industry and innovation,
- foster applicants' interest in the field,
- encourage employees to guide the applicants.

The company is committed to protect the safety and privacy of its employees and consultants.

Fail-Safe IT Solutions is committed to avoid child labor. Child labor refers to work that is physically, mentally, socially or morally dangerous and harmful to children and/or interferes with their schooling. The company wants to contribute to children's development and therefore supports educational institutions by offering trainee-ships and similar first employment opportunities for young individuals that are allowed and encouraged by the Finnish law. We will not employ individuals under 16 years old to avoid child labor practices.

The company is committed to follow Human Rights Policy in its recruitment policy. Following items must not affect hiring decision:

- gender
- skin color
- religion
- country of origin
- nationality
- age
- pregnancy
- sexual identity
- marital
- disability

This list is not limited to mentioned items. Mentioned items must not effect decisions on employment status, promotions, bonuses or similar. Fail-Safe IT Solutions will follow the Finnish Act on Equality between Women and Men that ordains to follow anti discrimination at work place.

Responsible Financials

Managers, employees and partners are dedicated to lawful and responsible financial management. Responsible financial management includes compliance with tax regulator, lawful trading practices, accounting and investing.

Managers and executives are committed to transparent and responsible investments.

Mismanaged financials or invoices will be reported to the supervisor or the compliance officer, who makes sure that affected parties receive timely information.

Owning stocks of competing, customer or other related company is not allowed. This excludes small ownership of publicly traded companies. Owning stocks in previously mentioned companies must be announced to the compliance officer.

Owners, Board Members, Professional Board Members and Other Directors

All governing and owner members of Fail-Safe IT Solutions are committed to oversee company direction and supervise management. It is board members' responsibility to govern and direct company's continuity to ensure relations with customers, employees and stakeholders.

Information Policy

Fail-Safe companies are dedicated to protect sensitive information.

Following information for employees must be kept secret:

- Company's strategy and business model

- Employees, customers, partner lists, consultant lists
- Patents and patent applications
- Company processes
- Unpublished marketing, sales or communication material

This list is not an exhaustive list. The employee must understand to keep company's information in secret.

Employees and other are also

- committed to refrain working in public spaces (i.e. library, restaurant, café).
- required to secure that phone or virtual meetings are not heard by non-company staff.
- not allowed to leave company's notes, drafts, contract papers or any other content visible to non-company staff.
- are required to secure that the private information, such as specific technologies or how they are used exactly, is not discussed in public spaces, social media, virtual meeting, job interviews or other.

If you are unsure what information you can disclose, you can always ask your supervisor for instructions.

Internal Communication: Transparency, Self-Initiative

The company has requested its employees to use their initiative what comes to communication. Supervisors must aim to have a relationship with their colleagues that

1. Enables transparency through communication and
2. Helps colleagues to initiate a dialogue.

The company must aim to announce all critical matters related to market, financials and staff.

External Communication: Representing Company and Statements

Employees, contractors, consultants and other are not allowed to give statements as a company. All inquiries must be directed to the company CEO.

Employee's Relationships with Supervisors and Colleagues

Managers, executives and long term employees are responsible for Fail-Safe's company culture. These people must foster fair and relaxed atmosphere that enables comfortable working environment. Every employee is responsible for their own part to create a safe working environment.

Unfair treatment, that is especially caused by the relationship between employees, must be reported to the supervisor, human resources or to the compliance officer. Please notice that the supervisor or a similar personnel can make some exceptions based on employee's personal situation. No employee is obligated to share their personal life or medical history with colleagues.

Supervisors and similar personnel has obligation to guard employee's privacy, including from their own supervisors.

Every employee is responsible for asking feedback and self-initiating communication. Supervisors and similar personnel are responsible for respecting employees and their effort by providing them an honest feedback that enables employee's growth.

Employee Relationships with Family Members in Stakeholder Companies

If an employee has family members, partners or close friends in competing companies, the employee must pay more attention to secured work space and peace. They must also ensure no confidential information is dispersed. Likewise, this concerns employees, who have previously mentioned people in customer or stakeholder organizations.

An information leak and an unfair position must be discussed with a supervisor. Relationships to stakeholder organizations may create tension at work place. To avoid this tension the employee must discuss actions and mitigation effect with the supervisor first.

Family or friends are not allowed to access to company's information. No excuses are accepted with this topic. Employees who are breaking the non-disclosure agreement and company's policy will be fully held reliable.

Gifts, Presents and Lobbying

Gifts and Presents for Customers

We allow employees to receive gifts from customers, partners and similar, if **they are something that can be consumed within a day and the gift's value is below 50 EUR**. The same applies to gifts that are given to customers, partners and similar. The gift must never be a stock, cash or anything similar.

Repeated gifts or lunches **needs to be disclosed** to the compliance officer, including executives and board members.

Supervisors are allowed to buy dinners or drinks to team members on their free time. However, they must notice favoritism is not allowed and such dinners may affect to the work environment, especially if some team members are excluded.

Gifts are not transferable to family or friends. Also, gifts **must never been given to a municipality, a politician, a parliament member, a government employee, a state employee or a legal authority.**

If you find out that a personnel, a board member or an executive may have been attempted to a bribe, please contact the compliance officer.

Political Gifts and Lobbying

Fail-Safe IT Solutions may join industry lobby groups on European and national level. The company has a responsibility to ensure that member fees are used ethically and responsibly.

The company will not donate to political parties in any country or use third party members to donate for political or state workers. The company may not give any assets, securities or cash to any politician. Additionally, this includes individual "communication", lobbyist or other similar groups.

Fail-Safe IT Solutions donates to non-governmental organizations. The NGO's may participate in political lobbying but the company aims to donate directly to organizations that handle intended purpose.

The company will not influence any employees' or executives' political view.

Employees are free to participate in politics in their free time. However, it might affect to relationships with colleagues and the company is not responsible for fixing them for that reason.

Fail-Safe may give statements to the government or other authorities if requested. However, these statements will be carefully considered with legal aid. Additionally, Fail-Safe may join statements of industry groups if seen necessary. These statements will be presented to the staff and stakeholders.

Disclosing Other Employers

If an employee starts a new company or organization while employed, it must be disclosed to the employer. The employer reviews if there is a conflict of interest.

The Employment Contracts Act states that employees are not allowed to have two full-time jobs.

Company Assets

Employees and contractors must protect company's assets that are given to them. Using personal accounts, such as social media or email accounts, on company's devices is not allowed.

Employees, executives and board members are obligated to keep company's assets out of reach for family members and outsiders. For example, company's devices, such as a computer, or notes must be stored behind locks where even family members cannot access.

All illegal activities that are performed by using company's assets are prohibited and will be reported to the local police. If an employee discovers illegal activities made by their colleague and fails to report it, they will be held equally responsible and will be forwarded to the authority as well.

When traveling, appropriate safety for handling company's assets is required (i.e. concealing assets, reliable locks). Only public marketing material can be deposited to public storage or areas.

Buying and contracting for the firm is only allowed for a personnel with underwriting authority.

Social Media

If you advertise Fail-Safe IT Solutions, its products or services on your personal social media accounts, you also must mention that you are an employee at the company. You are not allowed to use the company's name in your user account name. The usage of company's logo or promotional material is limited to LinkedIn.

External consultants are never allowed to mention Fail-Safe IT Solutions on their social media accounts.

Technical staff must never disclose that they work for Fail-Safe elsewhere than on LinkedIn.

If you see false information or advertisement about the company or its products, please report it to your supervisor with a screen shot picture.

Threatening Partners and Other Stakeholder Companies

Fail-Safe's employees, executives and other staff are not allowed to do "personal favors" or anything similar to customers, partners or any stakeholder organization. All this type of activity must be reported to the company CEO. **If an employee fails to report this type of activity they will be held equally responsible.**

Employees and executives may propose a charity or working possibilities with public sector and NGO's for charity and charitable causes. Proposals must be directed to the company CEO.

Fail-Safe IT Solutions and its staff respects customer's code of conducts. The staff members are allowed to violate the customer's code of conduct only when it forces to follow illegal practices or is against Fail-Safe's code of conduct.

Environment, Environmentally Conscious Procurement, Circular Economy

Fail-Safe companies are committed to act environmentally conscious. To follow this guideline, following must be considered.

Circular Economy

Fail-Safe's strategy must align with the circular economy to reduce waste and to preserve resources.

Procurement

Items that are bought for production, employees, customers and other, may fill all or must fill at least one of following criteria:

1. The item is re-usable
2. The item reduces waste
3. The item or its material is sourced sustainably or produced sustainably

If the company can not source from a source that has been proven being ethical, the items must be used and maintained well to avoid waste.

Environmental Friendly Acts

Fail-Safe must instruct its employees to recycle all trash, such as candy wrapper or packaging material. There is a training for recycling in Finland to ensure correct recycling practices.

The company supports usage of renewable energy. In future the company may raise the issue of electricity supply with its partners.

Confidential Information, NDA's with Other Companies and Respecting Immaterial Rights

If an employee or a contractor has been employed by the competitor, their non-disclosure agreement must be respected.

Employees must follow the process for proposing new innovation in the company structure. Employee's rights for their own work must not be compromised by the company. However, the content that is created during the company's working time, always belongs to the employer.

Marketing

Fail-Safe complies with the Principles of Good Marketing Practices made by Finland's the Council of Ethics in Advertising. The Principles of Good Marketing Practices are based on ICC Advertising and Marketing Communication Code.

In marketing materials the gender must never be used

- for humiliating, disparaging or contemptuous way
- as a sex object or an inappropriate eye-catcher
- to give sexual hints or promises that has nothing to do with the product.

The marketing material also must never contain claims or implications that a person's status are socially, economically or culturally lower because of their gender. The marketing material must avoid to present what is typical for women or men if it maintains harmful social structures or increases gender discrimination.

The marketing must never be misleading or untruthful. All essential information about the company or its products must always be presented. The marketing must never harass, force or pressure the individual to buy.

According to the article B8 sponsorships and marketing material must not hurt historical, cultural, artistic or similar objects. The Fail-Safe is reliable to ensure that sponsorships and marketing is conducted in a manner that does not break this article as preserving culture and art is important.

Social and Environmental Impact to Sponsorships

Sponsorships, marketing materials and donations must always be first assessed by their impact to (Article B9, ICC Advertising and Marketing Communication Code)

1. Society
2. Environment

Fail-Safe hopes that its partners, contractors and organizations that receive donations consider ICC Advertising and Marketing Communication Code with their marketing activities and impact to society and environment.

Anti Competition Laws and Regulation

Fail-Safe It Solutions follows anti-competition laws of Finland and European Union. The company does not engage illegal practices with pricing policies (i.e. dumping).

The company is not allowed acquire, spread or use information that has been received from competitors, such as pricing.

Please notice that antitrust laws have serious consequences for companies who breaks them.

Privacy and GDPR

Fail-Safe IT Solutions respects legislation that aims to protect the private information. For example recruitment and payroll require handling sensitive information, such as addresses. The company follows privacy information regulation and educates the staff to have a necessary knowledge. Therefore Fail-Safe's employees are responsible for handling sensitive information in a way that does not danger privacy of any individual, organization or supplier.

Partner and contractor information is collected by Fail-Safe without permissions. Additionally, employee relationships require collecting private information.

It is important to recognize that the collected information may be utilized for legally required purposes and accounting.

If there is a need to collect sensitive information that has not listed above, the collection procedure is following:

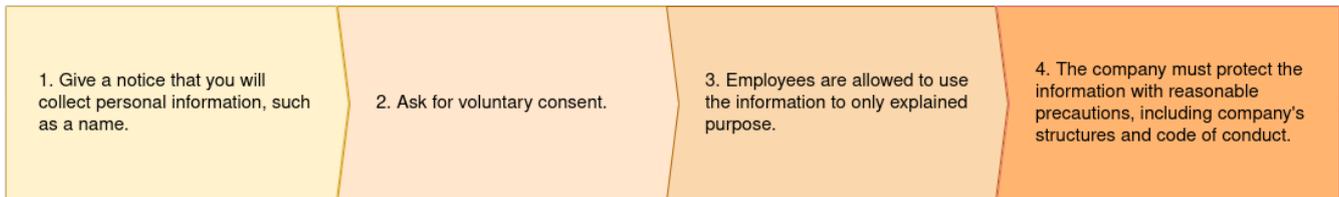


Figure 2: Collection of personal information