

# Administrative Policy

English original



## Code of Conduct

All units

KONE's mission is to improve the flow of urban life. Our vision is to deliver the best People Flow experience, providing ease, effectiveness and experiences to users and customers over the full life cycle of buildings. Our business conduct is based on honesty, integrity and fair play. This is not only what our customers and business partners expect from us, but it is also how we create a good working environment for everyone at KONE.

This Code of Conduct explains how we conduct our business in a responsible and ethical manner in order to win and retain customer trust. It is also designed to help employees make the right decisions in their daily working environment, throughout KONE's global operations. The Code sets out the conduct expected of KONE employees and KONE companies, while also addressing behavior that is not tolerated.

All employees of KONE should read, understand and comply with the policies defined below. This Code of Conduct applies throughout KONE, including all subsidiaries, branches and other entities where KONE exercises management control.

This Code of Conduct is publicly available on our website [www.kone.com](http://www.kone.com).

### 1. COMPLIANCE WITH LAWS AND RULES OF SOCIETY

KONE is committed to full compliance with all applicable laws and regulations. This Code of Conduct is not a substitute for, nor should it be considered to override, local laws and regulations. It represents supplementary principles and standards of behavior of a non-legal character.

KONE must be sensitive to prevailing cultural norms and practices in each country in which it conducts business. However, if such cultural norms and practices conflict with the spirit of this Code of Conduct, employees should comply with this Code of Conduct. If in doubt, employees should seek further guidance from KONE's Compliance Function.

### 2. WORK ENVIRONMENT

KONE seeks to create and maintain an environment in which each employee is valued as an individual and can work to his or her full potential.

KONE respects human rights as set forth in the United Nations Universal Declaration of Human Rights and basic labor rights as defined by the International Labour Organization. Within the context of its activities KONE respects the freedom of association and the right to collective bargaining. Especially where such rights are restricted by local law, KONE encourages employees to engage in dialogue with management, and report any grievances.

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## 2.1 Non-Discrimination

All KONE personnel shall be treated in a fair and equal manner by management as well as by fellow employees. KONE is committed to a policy of equal opportunity that prohibits discrimination of any type. Diversity is promoted and valued.

All decisions regarding an individual employee shall be based on merit, e.g., abilities, competence, skills and accomplishments. In making such decisions, no relevance shall be given to the employee's gender, age, religion, marital status, sexual orientation, political opinion, or national or ethnic origin, or other similar characteristics. KONE's objective and intention is to place employees in positions that are best suited to their capabilities.

## 2.2 Safety and Health

Every KONE employee has the right to a safe and healthy working environment. Every KONE employee is responsible for

- complying with KONE processes and safety instructions,
- using personal protection equipment and
- rectifying identified deviations from KONE safety processes.

All KONE employees are encouraged to report safety concerns affecting other KONE employees or users of KONE equipment to his/her superior or to unit Safety Manager. This issue is addressed in more detail in KONE's Safety Policy.

## 2.3 Freedom from Inappropriate Behavior and Sexual Harassment

KONE strongly believes that each employee has the right to be free from violations of personal integrity. Any type of harassment, regardless of intent, direct or indirect, physical or verbal, is prohibited. Offensive or inappropriate behavior will not be tolerated.

The above is particularly applicable to sexual harassment by any parties, including superiors, fellow employees, customers or suppliers – it will not be tolerated under any circumstances. Sexual harassment may appear in the form of unwanted sexual behavior or sexual comments during or after working hours. However, KONE cannot respond to harassment of which it is unaware. Victims or observers of behavior that they believe to constitute harassment are encouraged to contact their local Human Resources (HR) or the KONE Compliance Function.

## 2.4 Child or Forced Labor

KONE does not use child or forced labor, or contract with suppliers or subcontractors using them.

## 2.5 Computer Resources and E-mail

Employees may occasionally use computer and communication equipment provided by KONE, including the e-mail system, for personal matters, but such personal use should be kept to a minimum. All use of KONE's computer and communication equipment shall be responsible, professional and in accordance with company policies. In no event shall KONE's computer and communication equipment be used to engage in illegal, fraudulent or malicious activities, or to communicate or store offensive, obscene (e.g., pornographic) or political material.

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## 3. FAIR COMPETITION

Competition laws and KONE's Competition Compliance Policy prohibit discussions, communication, agreements and understandings with a competitor concerning prices, pricing policy, discounts, promotions, terms and conditions of sale, purchases, territorial markets, production costs, distribution, etc. However, spare parts sales and other sales and purchases from competitors in connection with the ordinary course of business are naturally legitimate and acceptable.

Discussions with competitors are to take place through legitimate forums, such as international or local industrial associations. However, discussion topics should in no event address issues that could be considered as breaches of competition laws.

This issue is addressed in more detail in KONE's Competition Compliance Policy.

## 4. ENVIRONMENT AND SUSTAINABILITY

Sustainability includes responsibility for the economic, environmental and social impacts of KONE's operations.

KONE provides safe, environmentally efficient and responsible high performance solutions and services. KONE strives to continuously improve such solutions and services with the environment and safety in mind.

KONE employees have a responsibility to consider the impact on the environment in everything they do. Every KONE employee must actively seek ways to work with KONE's suppliers and customers to prevent or reduce business operation-related emissions and waste.

## 5. MARKETING OF PRODUCTS AND SERVICES

Statements, communications, representations, and certifications provided to customers and business partners shall be truthful and correct. KONE does not disparage any of the products, services or employees of its competitors.

All our products must comply with all applicable regulations governing quality and safety and the promises we make concerning them.

## 6. RISKS AND CONFLICTS

### 6.1 Conflict of Interest

KONE expects its employees to be loyal and to make business decisions in the best interest of KONE. KONE employees must avoid all conflicts of interest, i.e. situations where their personal interests may be or appear to be in conflict with those of KONE. A conflict of interest may occur, for example, when:

- a close relative of an employee is a supplier, customer or competitor of KONE, or an employee of such a company

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- an employee or a close relative of an employee has a material interest in a company that does business with KONE
- an employee has outside employment or other activities with a company that competes or does business with KONE
- an employee has a personal relationship with a colleague in a direct or an indirect managerial or subordinate position
- an employee seeks to improperly further the interests of a friend or relative.

KONE employees must disclose all potential and actual conflicts of interest in writing to their supervisor and the local HR department.

## 6.2 Outside Employment and Board Memberships

Any KONE employee wishing to engage in an outside employment opportunity or have an outside managerial interest must disclose this intent to KONE. Such an activity may be acceptable provided that it does not interfere with the employee's responsibilities or create a potential or apparent conflict of interest. Such an activity is always subject to the prior approval of the employee's supervisor.

## 6.3 Investments

Personnel must declare to KONE any financial interest, direct or indirect, which they or members of their immediate family have in any company or organization that competes with KONE or with which KONE does business, excluding purely financial interests in a publicly listed and traded company.

## 6.4 Improper Payments or Benefits

KONE has zero tolerance for corruption, whether in the public or private sector. No direct or indirect bribe, gift, favor or payment shall be made to or for the benefit of any third party (including any governmental representative or employee, labor union, current or prospective customer or supplier or their representatives or employees) for the purpose of improperly obtaining a benefit of any kind. Nor shall any KONE employee accept improper payments, gifts, favors or benefits from any source whether directly or indirectly.

## 6.5 Business Gifts and Corporate Hospitality

Business gifts and corporate hospitality can be offered and accepted as acts of courtesy that help foster relations between parties, provided that they are given in compliance with applicable laws and that they do not breach this Code of Conduct.

Modest business gifts of reasonable value may be accepted and given. Gifts or benefits that are unreasonable in nature, frequency or value are prohibited.

Cash gifts of any amount in any currency can never be received or given.

Reasonable business-related entertainment and other corporate hospitality is acceptable when customary. Such entertainment includes, for example, receptions or social events that are attended in KONE's interest. A KONE employee may thus accept occasional appropriate business meals from a supplier, service provider or entity seeking to do business with KONE. When entertaining our customers, a KONE representative must always be present.

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## Business gifts and corporate hospitality

- must never influence KONE employees' business decisions
- must not place an employee or KONE under any obligation
- should represent customary business courtesies
- be reasonable in value and frequency
- should not be offered to obtain an undue advantage
- should not be accepted if the nature, value or timing of the benefit or corporate hospitality being offered or accepted could give rise to the suspicion of unduly influencing a business decision or approval by an authority.

If a KONE employee is offered or receives a request for any gift or entertainment that is in breach of these rules, he/she must inform his/her manager without delay.

The above principles also apply to business gifts and corporate hospitality offered to KONE employees' family members in connection with KONE business.

More detailed local guidelines may apply to KONE employees in certain countries or business areas/functions.

## 6.6 Anti-fraud

Company funds and property must always be used in a responsible manner and for the intended and legitimate purposes. Any information given to KONE when requesting reimbursement or cost compensation, benefits, or approvals for using KONE property must always be accurate and reliable. Any kind of theft, fraud, embezzlement or other misuse of KONE property is prohibited.

## 6.7 Political Activities and Contributions

KONE honors and values the freedom of each KONE employee to choose a political view. However, to ensure that fellow employees are not offended by KONE personnel expressing their political opinions, KONE premises and work-related events shall be free from political activities and expressions of political beliefs.

KONE's funds or resources shall not be contributed directly or indirectly to political campaigns, political parties or candidates or public officials or anyone associated with them. KONE employees shall ensure that their personal political activities or opinions are not represented to be those of KONE.

## 7. HANDLING OF INFORMATION

### 7.1 Information Security and Intellectual Property Rights

Information is a valuable corporate asset. KONE safeguards the confidentiality, integrity and availability of its proprietary information. All KONE employees are responsible for the proper protection of KONE's assets, including intellectual property and confidential information. Such information shall be managed, used, disclosed and distributed in accordance with applicable KONE policies.

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KONE employees shall respect the intellectual property rights and non-public information of others and manage such information in accordance with applicable laws and regulations as well as contractual requirements.

## 7.2 Data Protection

KONE is committed to protecting personal data. Personal data means any information relating to an identified or identifiable person. Any processing of employee, customer, supplier or other personal data at KONE must be lawful, fair and transparent in relation to the individuals concerned. Furthermore, personal data must be processed in accordance with the relevant KONE policies, guidelines and legislation.

## 7.3 Inside Information and Securities Trading

It is both illegal and against KONE policy for any of its employees to profit by misusing undisclosed information relating to KONE or any company with which KONE does business. It is also prohibited to use any such information for the benefit of any third party.

Until released to the public, material information concerning KONE or its business is inside information. KONE employees with inside information are subject to insider trading laws regarding the purchase or sale of KONE shares and communication with others regarding the same.

This issue is addressed in more detail in KONE's insider regulations.

## 7.4 Financial Reporting

All KONE Corporate Reporting in every KONE unit must follow KONE's accounting standards (KAS) and other applicable rules and be accurate and reliable in all material aspects. All of KONE's assets and liabilities must be duly recorded and the financial reporting and/or financial records shall not contain any false, misleading or artificial entries or information.

All statutory financial statements and filings as well as KONE consolidated financial statements must comply with the laws, rules and standards applicable to the particular type of reporting.

## 8. SUPPLIERS AND BUSINESS PARTNERS

KONE wants to be an attractive business partner and seeks reliable and fair relations for the mutual benefit of KONE and its suppliers, service providers, subcontractors and other business partners.

KONE deals fairly with its suppliers and business partners. Inappropriate actions or improper efforts to influence KONE's purchasing decisions by suppliers or business partners are grounds for rejection or termination of an existing agreement. KONE expects that all its suppliers, distributors and agents comply with separately established Codes of Conduct for suppliers and distributors.

Consulting and agency arrangements must be in writing, reasonable in amount, and reflect work actually performed on behalf of KONE.

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## 9. REPORTING VIOLATIONS AND SANCTIONS

KONE has zero tolerance for violations of this Code of Conduct. Failure to comply with or instructing or forcing another employee or KONE's supplier or business partner to breach this Code of Conduct will result in appropriate disciplinary action, up to and including possible dismissal and payment of damages. Certain violations of a criminal nature can also lead to criminal sanctions.

Every KONE employee is responsible for reporting any actual or potential violation of this Code of Conduct to the local management, the KONE Legal Function or KONE's Compliance Function. Alternatively employees can report concerns online or by phone through the KONE Compliance line, which is available in local languages and may be used anonymously where permitted by local law. Contact details are available on the global intranet.

All communications relating to actual or potential violations of the Code of Conduct will be kept confidential whenever possible. KONE does not tolerate any form of retaliation against any individual who reports a violation of this Code of Conduct in good faith. Preventing an employee from reporting a violation of this Code of Conduct is prohibited and may result in disciplinary action.

## 10. QUESTIONS AND ADVICE

Any employee with a compliance concern or a question about this Code of Conduct is encouraged to talk to his/her supervisor, or local management, or get in touch directly with the KONE Compliance Function, or local or global legal or HR department for support.